

IN THE EXECUTIVE ETHICS COMMISSION  
OF THE STATE OF ILLINOIS

IN RE:        JOHN SHEALEY,                    )        OEIG Case #11-00964  
               KEVIN MCKEON,                   )  
               ANDREW CASPER,                   )  
               ROBERT MATTHEWS,                   )  
               DAVID ALCANTAR,                   )  
               DIMITRIUS COLEMAN,                   )  
               SEAN HUBER,                   )  
               JEROME LOCKHART,                   )  
               FRANCOIS MENDEZ,                   )  
               MICHAEL PIWCEWICZ,                   )  
               JOSEPH HUANTE,                   )  
               ROBIN THORPE,                   )  
               ZENON MCHUGH, and                   )  
               JOHN GONZALEZ.                   )

OEIG FINAL REPORT (REDACTED)

Below is an amended final summary report from an Executive Inspector General. The General Assembly has directed the Executive Ethics Commission (Commission) to redact information from this report that may reveal the identity of witnesses, complainants or informants and “any other information it believes should not be made public.” 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes-competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report’s factual allegations or legal conclusions before the Commission.

The Commission received this report from the Governor’s Office of Executive Inspector General (“OEIG”) and a response from the agency in this matter. The Commission, pursuant to 5 ILCS 430/20-52, redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor’s Executive Inspector General, and to all listed respondents at their last-known addresses.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52.

## **FINAL REPORT**

### **I. INTRODUCTION**

On June 27, 2011 the OEIG received information that the Illinois Department of Transportation (IDOT) discovered discrepancies during an internal audit of its “Pay for Fuel” program<sup>1</sup> suggesting that Emergency Traffic Patrol (ETP) Highway Maintainer John Shealey falsified fuel disbursement receipts and engaged in theft; a subsequent investigation by the Illinois State Police (ISP) resulted in disciplinary action against Mr. Shealey.<sup>2</sup> The OEIG then focused on other possible instances of false documentation by Mr. Shealey, specifically on his Traffic Assist Reports (Assist Reports) that are required to detail each instance of roadside assistance provided throughout the day. Ultimately, investigators discovered that in just a three-month period of time,<sup>3</sup> Mr. Shealey submitted numerous Assist Reports containing false or inaccurate information. Concerned that Mr. Shealey’s misconduct was indicative of a larger problem and not isolated to just one person, the OEIG expanded its investigation to the other ETP drivers.

Through its extensive investigation, the OEIG learned that Mr. Shealey was not the only driver submitting false and fraudulent Assist Reports—numerous others admitted to doing the same and said it was simply part of the “culture” at ETP in order to increase their number of daily assists. The false number of reported assists has been used by IDOT to gauge the productivity and value of the ETP program, make important personnel decisions, and justify funding for the program’s continued existence; therefore, the uninhibited submission of false and fraudulent Assist Reports means that significantly inflated numbers are being used to inform these decisions and dictate the expenditure of significant amounts of State resources and money.

Investigators also discovered that several ETP supervisors were either aware or suspicious that drivers had been submitting false and fraudulent Assist Reports on a regular basis for years, but did nothing to prevent, control, or eliminate the practice. Instead, managers continued to push drivers to perform more assists without any checks to ensure driver accuracy or honesty. ETP management fostered an environment where wrongdoing was accepted and encouraged. Ultimately, the OEIG believes the misconduct at ETP is so widespread and systemic that sweeping changes are necessary.

### **II. IDOT EMERGENCY TRAFFIC PATROL (ETP)**

The Illinois Department of Transportation consists of four divisions and nine offices that oversee operations ranging from aeronautics to public and intermodal transportation, traffic

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<sup>1</sup> In February 2009, IDOT implemented a “Pay for Fuel” program to encourage motorists to reimburse the State for emergency fuel provided by ETP drivers. Further information regarding the 2011 audit of the program is discussed below.

<sup>2</sup> Although the OEIG received the complaint in 2011, an OEIG investigation did not begin until the conclusion of the ISP investigation in 2012.

<sup>3</sup> As detailed further below, investigators began by reviewing all Assist Reports submitted by Mr. Shealey from January 31, 2011 to April 30, 2011.

safety, and highways.<sup>4</sup> IDOT's Division of Highways, which is "responsible for developing, maintaining, and operating the State highway system in a timely, efficient, and economical manner,"<sup>5</sup> is organized into nine districts within the State.<sup>6</sup> Two of these Division of Highways districts, District One and District Eight, have an ETP unit which provides 24/7 emergency vehicle services to the motoring public. IDOT District One's ETP unit provides services across 949.1 lane miles of expressways in the Chicagoland area 365 days a year,<sup>7</sup> and costs the State of Illinois more than \$13 million annually.<sup>8</sup> This investigation only involved District One's ETP unit and thus, any further mention of an ETP unit in this report only refers to District One's ETP unit.

#### **A. ETP Personnel And Organizational Structure**

As of December 2015, the IDOT ETP unit employed over 80 personnel, including more than 70 ETP drivers.<sup>9</sup> Each driver is assigned to one of three shifts—morning, afternoon, or evening—with approximately 20 other drivers who are typically supervised by three Lead Workers and one Lead Lead Worker. In the entire unit, there are nine Lead Workers and three Lead Lead Workers at ETP.<sup>10</sup>

The organizational chart below, created by the OEIG, illustrates the organization and hierarchy of the ETP unit, and shows the relationship that the employees discussed in this report have with one another.

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<sup>4</sup> <http://www.idot.illinois.gov/about-idot/our-story/governance/organizational-structure/> (last visited 10/31/2014).

<sup>5</sup> <http://www.idot.illinois.gov/about-idot/our-story/governance/organizational-structure/division-of-highways/index> (last visited 10/31/2014).

<sup>6</sup> *Id.*

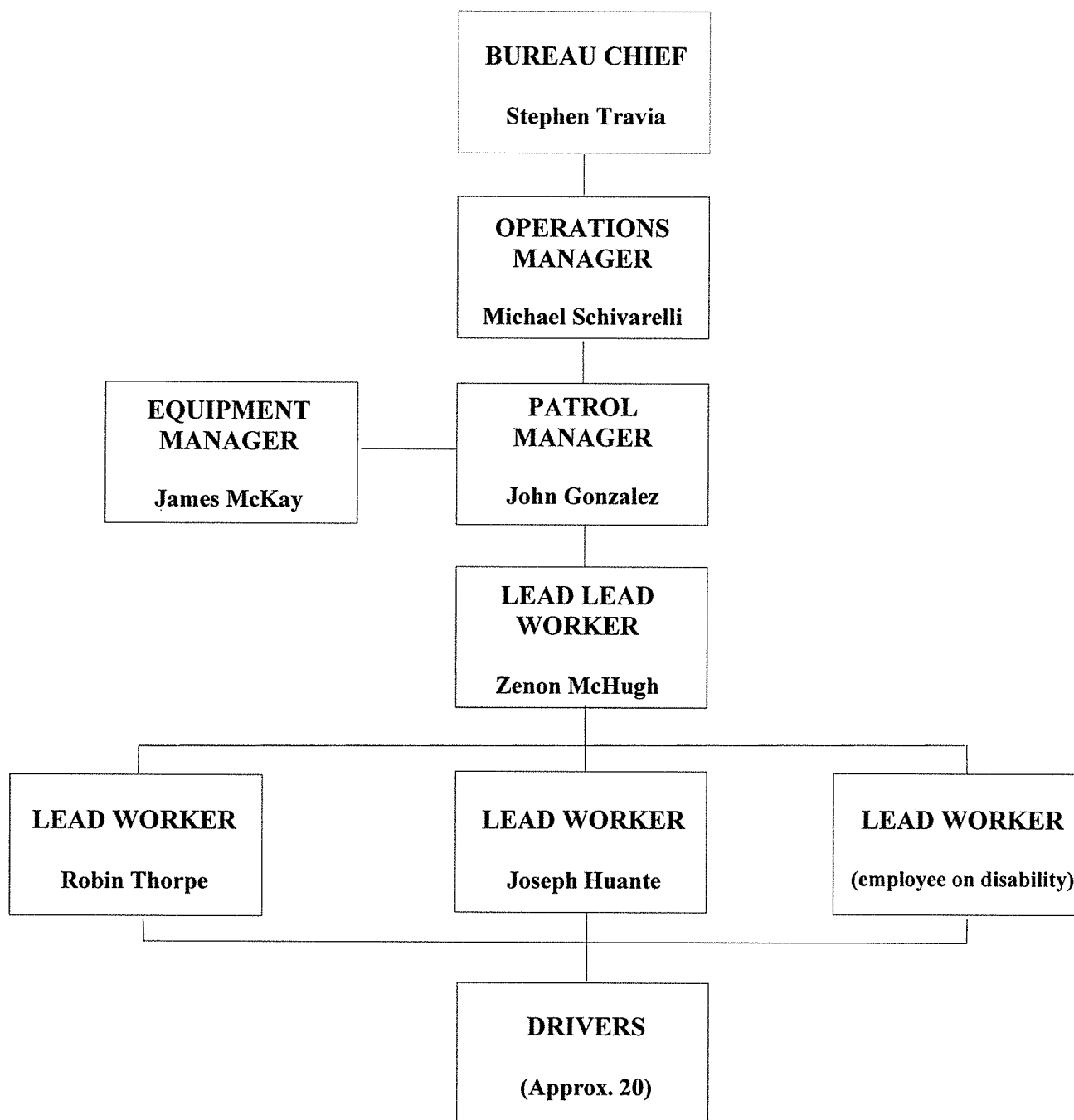
<sup>7</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*, Introduction.

<sup>8</sup> *IDOT*, Summary of Total Operational Expenses for Emergency Traffic Patrol for FY 2015.

<sup>9</sup> The official title of an ETP driver is "Highway Maintainer." These IDOT employees will primarily be referred to as "drivers" in this report.

<sup>10</sup> As with the drivers, due to leaves of absence, the ETP unit has approximately 10 active Lead Lead and Lead Workers at any given time.

**OEIG CHART OF RELEVANT IDOT AND ETP EMPLOYEES**



As previously noted, there are three shifts within the ETP unit. Each shift typically consists of one Lead Lead Worker, three Lead Workers, and approximately 20 drivers. While the above chart reflects only one shift, the two other shifts are structured in the same manner.

In 2014, the average salary of eight of the drivers interviewed during this investigation<sup>11</sup> was approximately \$101,000. Several of those drivers' salaries also surpassed \$100,000 in 2015. The average 2014 salary for the three Lead Lead and Lead Workers discussed in this report totaled \$105,700. The complete 2014 salary breakdown of the individuals included in the above chart is detailed in *Attachment A*.

## **B. Relevant ETP Rules And Framework**

The IDOT maintains a Personnel Policies Manual which, among other things, dictates the conduct expected of IDOT employees.<sup>12</sup> Specifically, this Manual details numerous guidelines all IDOT employees are required to comply with, and provides that failure to do so can result in disciplinary action.<sup>13</sup> Throughout the investigation, two specific guidelines were determined to be relevant: Truth in Reporting and Work Performance.

The Personnel Policies Manual provision on Truth in Reporting provides that “employees are expected to report accurately and truthfully all information pertaining to employment including, but not limited to . . . any written reports[.]”<sup>14</sup> The Manual also contains a provision regarding Work Performance, which states:

Employees shall perform their duties to the best of their abilities and cooperate with others in the performance of their duties as assigned. Inattention to work, including but not limited to, sleeping, loitering or loafing shall not be tolerated. Employees are expected to possess and demonstrate the skills and abilities necessary to perform the duties and responsibilities of their position. Work assignments shall be completed accurately, in a timely fashion and with good workmanship and judgment.<sup>15</sup>

In addition to the IDOT Personnel Policies Manual, the ETP unit maintains its own Policy and Procedure Manual which employees assigned to ETP are required to follow.<sup>16</sup> Notably, the ETP Policy and Procedure Manual specifically provides that the “intentional falsification of any personnel or working record”<sup>17</sup> is an example of a rule infraction, along with “engaging in, instigating or causing any interruption or impeding of work,”<sup>18</sup> and the “use of work time for other than work purposes.”<sup>19</sup>

Finally, the IDOT Personnel Policies Manual specifically addresses the responsibilities of those in supervisory roles. Specifically, it states:

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<sup>11</sup> The other two drivers interviewed each took a leave of absence for extended periods in 2014. Therefore, the salary they each earned in 2014 was significantly reduced, and was not included in this calculation.

<sup>12</sup> *IDOT Personnel Policies Manual* (rev. November 5, 2012).

<sup>13</sup> *IDOT Personnel Policies Manual*, section 10-2.

<sup>14</sup> *IDOT Personnel Policies Manual*, section 10-3(W).

<sup>15</sup> *IDOT Personnel Policies Manual*, section 10-3(Y).

<sup>16</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*.

<sup>17</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*, Article 1.16(4).

<sup>18</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*, Article 1.16(14).

<sup>19</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*, Article 1.16(17).

Supervisors are expected to exercise proper supervision over subordinates. Supervisors shall take corrective action when warranted and address/report misconduct and/or rule violations of subordinates in a fair, consistent, and equitable manner.<sup>20</sup>

### C. ETP Assistance

Each day, the drivers reporting to work are assigned an area of expressways to patrol during their shift. These drivers are expected to provide assistance to disabled vehicles, and clear any obstructions of the roadway. A driver may be alerted to motorists needing assistance in a variety of ways,<sup>21</sup> and throughout the day, is often called upon to change tires, provide emergency gas, jumpstart a battery, tow a vehicle, secure accident scenes, and pick up debris. Although there is no official quota in place, drivers are expected by their supervisors and ETP management to perform eight to 10 assists per shift, and travel 100 to 120 miles.<sup>22</sup> In 2014, the ETP unit reported 124,166 assists.

At the conclusion of each assist performed, the responding driver is required to fill out an Assist Report detailing the assistance provided. An Assist Report is a piece of paper with several categories of information, most of which require the driver to pencil the appropriate “bubble.”<sup>23</sup> The drivers are trained on how to fill out the Assist Report, and are required to complete it fully, accurately, and truthfully after each assist performed. Specifically, the driver must record the following information on each Assist Report:<sup>24</sup>

- date of the assist;
- driver’s arrival and departure time;
- driver’s truck and badge numbers;
- reason for the assist (i.e. tire, electrical system, accident, etc.);
- type of assistance provided (i.e. repaired disability, relocated vehicle, etc.);
- location of the assist;
- license plate of the vehicle being assisted; and
- ISP squad number, if present.

At the end of each shift, the drivers are required to submit their Assist Reports to the ETP supervisor on duty—which is already the supervisor for the oncoming shift—to record each driver’s total number of assists and miles traveled on a “master sheet.” Once each driver’s number of assists and mileage is recorded by a supervisor, ETP administrative staff scan each

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<sup>20</sup> *IDOT Personnel Policies Manual*, section 10-2.

<sup>21</sup> For example, a driver may happen upon a disabled vehicle or incident while on patrol, be dispatched to a location by the IDOT District 1 Communication Center or an ETP supervisor, or overhear the need for ETP assistance on the Illinois State Police radio frequency.

<sup>22</sup> According to various ETP drivers and supervisors interviewed by the OEIG, these requirements have been changed or adjusted over the years, but have remained the same since approximately 2012.

<sup>23</sup> For example, the driver fills in the pre-printed bubbles with information such as the date, time, and type of assist; and some of the other information is completed by the driver handwriting information, such as the license plate number of the vehicle assisted and location of the assist.

<sup>24</sup> A sample Assist Report is included as *Attachment B*.

Assist Report into IDOT's computer system. The unaudited data from the Assist Reports can then be used to create spreadsheets and reports detailing the total number of assists by driver, the location of assist, the time of assist, the type of assist needed, and more. Additionally, ETP administrators use Assist Report data to determine each shift's appropriate staffing level, inform overall personnel decisions,<sup>25</sup> and gauge the drivers' productivity.

ETP Lead Lead and Lead Workers generally help train new drivers, handle shift paperwork, and patrol the expressways and help coordinate assists when needed. The ETP Lead Lead and Lead Workers on each shift are generally assigned one of three areas to patrol—north, south, and central—which, combined, amount to approximately 13 different driver assignments across the Chicago-area expressways. The supervisors discussed in this report—Lead Lead Worker Zenon McHugh, Lead Worker Robin Thorpe, and Lead Worker Joe Huante—all began their ETP careers as drivers.

#### **D. ETP Technology**

The ETP unit has a radio frequency that the drivers use to communicate with dispatch at the IDOT Communications Center while they are on the road. ETP drivers are required to respond to calls from dispatch, notify dispatch of any assists they otherwise happen upon, and alert dispatch each time they exit and enter their ETP truck. Each ETP Lead Lead and Lead Worker has access to the ETP radio frequency.

Additionally, the IDOT Communications Center maintains an Automatic Vehicle Location (AVL) system that tracks each ETP truck in real-time. The AVL system, in use since 2004, allows IDOT Communications Center dispatchers to see where any ETP truck is at any given time. However, ETP supervisors do not have access to this system.

### **III. BACKGROUND OF INVESTIGATION**

#### **A. IDOT's 2011 Internal Audit Of "Pay For Fuel" Disbursement Tickets<sup>26</sup>**

In the spring of 2011, IDOT discovered discrepancies during an internal audit of its "Pay for Fuel" program suggesting that ETP Highway Maintainer John Shealey had engaged in theft. Specifically, while reviewing fuel disbursement tickets submitted by ETP drivers, IDOT auditors discovered that Mr. Shealey listed the same license plates on multiple fuel tickets between March 22, 2010 and February 26, 2011. IDOT auditors noted that Mr. Shealey listed license plate number "2141935" on eight fuel tickets during this period, and Mr. Shealey listed license plate number "6912579" on 14 fuel tickets during this period.

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<sup>25</sup> According to various IDOT and ETP administrators, Assist Report data is commonly used to justify the number of trucks ETP needs in its fleet, the filling of vacancies, and to determine what assignments and locations have historically had the most assists (and therefore, where drivers should more often be assigned).

<sup>26</sup> When an ETP driver provides emergency fuel to a motorist, that motorist is provided with an Emergency Gasoline Payment Envelope that he or she is asked to mail into IDOT with appropriate payment, and the driver will keep a tear-away fuel disbursement receipt listing his badge number, the date, motorist's name and address, and the assisted vehicle's license plate number. At the end of each shift, the driver must submit his or her daily fuel disbursement tickets and corresponding Assist Reports to the supervisor on duty.

Further investigation by IDOT revealed that license plate number 2141935 had never been issued to a motorist by the Illinois Office of the Secretary of State (Secretary of State), and that while license plate number 6912579 *was* issued to a motorist, that motorist's name and address *did not* appear on any of the disbursement tickets submitted by Mr. Shealey.

In light of its discoveries, IDOT referred Mr. Shealey's alleged misconduct to the Illinois State Police (ISP) Division of Internal Investigation (DII) on May 3, 2011.

## **B. Illinois State Police Investigation Of John Shealey**

The ISP began an investigation into the validity of Mr. Shealey's fuel disbursement tickets in or around May 2011. As part of the investigation, the ISP analyzed Mr. Shealey's fuel disbursement tickets, conducted interviews, and attempted surveillance of Mr. Shealey.

### **1. Analysis of Mr. Shealey's Fuel Disbursement Tickets**

ISP troopers reviewed a sample of the fuel tickets submitted by Mr. Shealey between March 22, 2010 and February 26, 2011. Troopers discovered that of all the addresses listed on Mr. Shealey's disbursement tickets, only *one* was a legitimate address.<sup>27</sup> Upon further investigation, troopers discovered that the name listed on the fuel ticket was not a person living at that address, nor did anyone at that address know of a person by that name. The investigation additionally revealed that license plate number [REDACTED], listed on 14 fuel disbursement tickets, was registered to an individual named [Individual 2]. Troopers subsequently located and interviewed [Individual 2], who informed them that this license plate had been in storage for some time, and when he had driven a vehicle with that license plate number, he never ran out of gas, nor was he ever provided gas by an IDOT worker.

### **2. Interview of Mr. Shealey**

On August 31, 2011, [Trooper 1] interviewed ETP Highway Maintainer John Shealey regarding the "Pay for Fuel" program and discrepancies discovered among his fuel disbursement tickets. During the interview, Mr. Shealey admitted to:

- accepting money and gifts from motorists for services provided as part of his job;<sup>28</sup>
- not completing the required "Pay for Fuel" envelope approximately 50-60 times after he distributed gas to motorists; and
- falsifying the 22 fuel tickets listing either license plate number 2141935 or license plate number 6912579.<sup>29</sup>

At the conclusion of the interview, Mr. Shealey agreed to provide the ISP a voluntary written statement detailing his admissions. However, because of poor spelling and handwriting,

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<sup>27</sup> This disbursement ticket listed a "[Individual 1]" as the vehicle owner.

<sup>28</sup> Mr. Shealey admitted he had received wine, a fruit pie, and \$20 from motorists on several occasions, though he was unable to provide a total amount of money received.

<sup>29</sup> Mr. Shealey informed [Trooper 1] that he used 2141935 because it was his mother's birthday and was easy for him to remember, and 6912579 because it was a number he had memorized and continued to use.

Mr. Shealey requested [Trooper 1] write the statement for him using Mr. Shealey's words. After [Trooper 1] completed the written statement, Mr. Shealey read it over and signed it, agreeing to its contents.

### **3. Attempted Undercover Operations**

The ISP planned an undercover operation to take place during Mr. Shealey's work hours on March 6, 2012. ISP troopers informed only two ETP employees of this plan, and relied upon them to ensure Mr. Shealey was assigned to the patrol area where troopers planned the operation to take place. However, days before the operation, the individual responsible for making driver assignments informed police that he no longer wished to be involved. Then, on the date of the planned operation, Mr. Shealey's assignment was changed at the last minute, and the operation had to be cancelled.

On April 16, 2012, ISP troopers again attempted an undercover operation. However, Mr. Shealey's patrol area was once again unexpectedly switched the morning of the attempt, making the undercover operation impossible. No further attempts at the undercover operation were made.

### **C. IDOT's Discipline Of John Shealey**

After a pre-disciplinary hearing on August 7, 2012, IDOT determined that Mr. Shealey's falsification of fuel tickets and acceptance of money and other gifts from motorists between March 22, 2010 and February 26, 2011 violated numerous provisions of the IDOT Personnel Policies Manual, and charged Mr. Shealey with a number of infractions, including:

- unethical conduct;
- poor public image;
- misuse of State property;
- falsification of documents; and
- failure to follow procedures/inefficient performance of duties.

Days later, Mr. Shealey responded to the charges against him. Though he wrote that "all statements outlined on voluntary statements written by [Trooper 1] misrepresented the content of statements made to him and utilized his own words," he admitted to "on occasion utilizing 2 numbers from memory in the past only in situations where personal safety" was at issue, and "never in attempt for money or personal gain [sic]." Mr. Shealey further indicated that after review of his past actions and after watching an Ethics in the Workplace video, he now understood "more about the benefits of making good ethical decisions and the consequences of making bad decisions."

Ultimately, Mr. Shealey received a 10-day suspension for his misconduct, which he served from September 16 to 26, 2012. Mr. Shealey returned to duty on September 27, 2012.

## IV. INVESTIGATION

After the ISP's investigation of Mr. Shealey concluded, the OEIG began an investigation in order to determine whether there were other possible instances of fraud and wrongdoing. Investigators obtained all Assist Reports submitted by all ETP drivers from January 31 until April 30, 2011, and reviewed the Assist Reports of the drivers assigned to Mr. Shealey's shifts during this period. Through this review, the OEIG identified Mr. Shealey and three other drivers -- Kevin McKeon, Andrew Casper, and Robert Matthews -- as having submitted numerous Assist Reports containing a license plate that was the same or similar to a license plate listed on another Assist Report.

The OEIG obtained and reviewed numerous documents from the Illinois Secretary of State, interviewed dozens of motorists, conducted surveillance and interviewed ETP drivers, supervisors, and administrators. The OEIG's investigation of each of these four drivers is detailed below.

### A. OEIG Investigation Of ETP Highway Maintainer John Shealey

#### 1. Review of Mr. Shealey's 2011 Assist Reports

Investigators reviewed 613 Assist Reports submitted by Mr. Shealey between January 31, 2011 and April 30, 2011. During this review, investigators noticed that several license plates either appeared on more than one Assist Report, or were similar to other license plates appearing on Mr. Shealey's Assist Reports during this period.<sup>30</sup> Investigators then reviewed Illinois Secretary of State records<sup>31</sup> and conducted interviews with the identified owners of several license plates used by Mr. Shealey, and determined that 139 of his Assist Reports for this period contained false or inaccurate information. Specifically, investigators determined that:

- 22 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (see *Attachment C*);<sup>32</sup>
- 10 listed a license plate that had never been issued to a vehicle owner (*Attachment D*);
- 12 listed a license plate that was not issued to a vehicle owner until *after* the date of the assist (*Attachment E*); and
- 60 listed a license plate that Secretary of State records indicated was not registered to any owner on the date of the alleged assist (*Attachment F*).

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<sup>30</sup> Specifically, investigators noticed several instances where license plates appearing on Mr. Shealey's Assist Reports had the same first five or six digits out of the seven-digit plate number.

<sup>31</sup> Investigators obtained Secretary of State records for: 1) each license plate appearing on more than one of Mr. Shealey's Assist Reports during this time; 2) each license plate that was substantially similar to another license plate used by Mr. Shealey during this time; and 3) 10 other randomly selected license plates that appeared on Mr. Shealey's Assist Reports during this time.

<sup>32</sup> For a list of these 22 Assist Reports, see *Attachment C*. Each subsequent list will be similarly referenced.

In addition to those included in the above categories, the OEIG identified 35 more Assist Reports submitted by Mr. Shealey that listed a license plate number that appeared on multiple Assist Reports, or a license plate number that was noticeably similar to a license plate number listed on another of Mr. Shealey's Assist Reports (*Attachment G*).<sup>33</sup>

Finally, investigators discovered that some of the license plate numbers used by Mr. Shealey during this time were numbers meaningful to Mr. Shealey. Specifically:

- License plate 2141935, which Mr. Shealey reported assisting five times during the three-month period reviewed, matches the birth date of Mr. Shealey's mother – February 14, 1935. During the ISP investigation, Mr. Shealey admitted this was his mother's birthday, and he fraudulently listed it on fuel receipts on multiple occasions.
- License plate 6912579, a number which Mr. Shealey admitted to the ISP that he used often on reports because it was a number he memorized, was used 13 times during this three-month period.
- License plate 3121935, which Mr. Shealey reported assisting 14 times on 13 separate dates,<sup>34</sup> matches the birth date of Mr. Shealey's father – March 12, 1935.

## **2. June 2013 Surveillance of Mr. Shealey and Review of Mr. Shealey's Corresponding Assist Reports**

On June 11, 17, and 18, 2013, three to four teams of OEIG investigators conducted surveillance of Mr. Shealey during his work hours.<sup>35</sup> Investigators maintained visual surveillance of Mr. Shealey throughout his workday,<sup>36</sup> and recorded his actions as they occurred. During this time, the OEIG also had access to the radio frequency used by the ETP drivers, supervisors, and the IDOT District One Communications Command Center.

After conducting surveillance, investigators obtained copies of the Assist Reports Mr. Shealey submitted for the days of surveillance. Highlights of the OEIG's observations during surveillance and the information contained on Mr. Shealey's corresponding Assist Reports are discussed below.

### **June 11, 2013 Surveillance**

- Mr. Shealey spent 2 hours and 58 minutes off the expressway.
- During the time he was off the expressway, Mr. Shealey was at restaurants and gas stations, and parked at Accident Investigation Sites and on side streets;

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<sup>33</sup> Only license plates meeting these criteria and not already included in any of the above categories were included in this section.

<sup>34</sup> Mr. Shealey reported assisting this vehicle two separate times on March 7, 2011.

<sup>35</sup> In June 2013, Mr. Shealey was assigned to the Day Shift. According to ETP policy, drivers on the Day Shift work from either 5:00 a.m. to 1:30 p.m.; 5:15 a.m. to 1:45 p.m.; or 5:30 a.m. to 2:00 p.m.

<sup>36</sup> OEIG investigators lost visual contact of Mr. Shealey on June 11, 2013 from 7:02 a.m. to 8:06 a.m. and therefore were unable to verify his activity during this time.

- Mr. Shealey passed disabled vehicles without stopping to assist; and
- Mr. Shealey exited his truck to assist a vehicle on five occasions, but submitted nine Assist Reports (*Attachment H*).

### **June 17, 2013 Surveillance**

- Mr. Shealey spent 3 hours and 24 minutes off the expressway.
- During the time he was off the expressway, Mr. Shealey was at restaurants and gas stations, and parked on side streets;
- Mr. Shealey passed disabled vehicles on the expressway without stopping to assist; and
- Mr. Shealey exited his truck to assist a vehicle on nine occasions, but submitted 10 Assist Reports (*Attachment I*).

### **June 18, 2013 Surveillance**

- Mr. Shealey spent 5 hours and 29 minutes off the expressway.
- During the time he was off the expressway, Mr. Shealey was at restaurants and gas stations, and parked on side streets; and
- Mr. Shealey exited his truck to assist a vehicle on one occasion, but submitted nine Assist Reports (*Attachment J*).

In total, investigators observed Mr. Shealey perform 15 assists on the days of surveillance, though he submitted 28 Assist Reports. After reviewing these 28 Assist Reports submitted by Mr. Shealey, investigators discovered that at least 27 of these 28<sup>37</sup> Assist Reports were either entirely false—that is, the assist never happened—or reflected an assist that did occur, but contained false or inaccurate information, such as an incorrect license plate number, an incorrect location of assist, or an incorrect time of assist.

## **3. Review of Mr. Shealey's Additional 2013 Assist Reports**

In addition to the Assist Reports submitted for the days the OEIG conducted surveillance, investigators also reviewed the Assist Reports submitted by Mr. Shealey from May 1 to September 2, 2013.<sup>38</sup> Through review of Secretary of State records and interviews of registered license plate owners, investigators discovered that 44 Assist Reports contained false or inaccurate information. Specifically, investigators discovered that:

- 8 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (*Attachment K*);

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<sup>37</sup> As noted above, investigators lost visual surveillance of Mr. Shealey for approximately one hour on June 17, 2013. Therefore, investigators cannot verify whether the one Assist Report submitted by Mr. Shealey during this brief period reflected a legitimate assist.

<sup>38</sup> Mr. Shealey began disability leave at the close of business on September 3, 2013, and did not return until 2014. Accordingly, he did not submit any Assist Reports between September 4 and September 30, 2013 for investigators to review.

- 26 listed a license plate that Secretary of State records indicated was not registered to any owner on the date of the alleged assist (*Attachment L*); and
- 10 listed a license plate that Secretary of State records indicated was expired at the time of the alleged assist (*Attachment M*).

#### **4. Interview of Mr. Shealey**

On July 21, 2015, investigators interviewed John Shealey. Investigators reviewed IDOT and ETP policies with Mr. Shealey, as well as numerous Assist Reports that he has submitted during his time as an ETP driver. Mr. Shealey acknowledged that the 211 Assist Reports<sup>39</sup> investigators presented were his, and that he was the person who filled them out. After showing Mr. Shealey several Assist Reports listing the same license plate number, Assist Reports listing a license plate number whose owner denied receiving assistance, and showing Mr. Shealey evidence gathered during surveillance, Mr. Shealey admitted that he:

- submitted Assist Reports for assists that never occurred; and
- submitted Assist Reports for assists that did occur but had inaccurate information included.

Mr. Shealey told investigators that he had been submitting false and inaccurate Assist Reports since he began working at IDOT in 2002, and was still doing so at present. Mr. Shealey informed investigators that it is a “culture” at ETP to submit false Assist Reports, and that all ETP drivers do it. Mr. Shealey stated that he thought ETP supervisors knew this was occurring because they were drivers once too. Mr. Shealey stated that he knew falsifying Assist Reports was a violation of IDOT and ETP policies.

Mr. Shealey also admitted to sitting on side streets off the expressway for extended periods of time during his work hours, beyond the time allotted for his breaks. Mr. Shealey stated that on days when he does this and does not patrol his assignment like he is supposed to, he makes up Assist Reports to make it appear as if he was working. Mr. Shealey stated that he knew sitting on a side street for an extended period of time beyond what is allotted for breaks was against ETP policy.

#### **B. OEIG Investigation Of ETP Highway Maintainer Kevin McKeon**

Investigators reviewed Assist Reports submitted by Mr. McKeon from January 31 to April 30, 2011 and May 1 to September 30, 2013,<sup>40</sup> and conducted surveillance of Mr. McKeon for two days in June 2013.

##### **1. Review of Mr. McKeon’s 2011 Assist Reports**

Investigators reviewed 395 Assist Reports submitted by Mr. McKeon from January 31 to April 30, 2011. During this review, investigators discovered that several license plates either

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<sup>39</sup> These Assist Reports are detailed in *Attachments C* through *M*.

<sup>40</sup> Investigators identified Assist Reports filled out by Mr. McKeon based on his Patrolman Number, listed on each Assist Report.

appeared on more than one Assist Report, or were similar to other license plates listed on Mr. McKeon's submitted Assist Reports during this period. After obtaining and reviewing Secretary of State records, and conducting interviews of several registered owners of these license plates, investigators discovered that:

- 14 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (*Attachment N*); and
- 11 listed a license plate that Secretary of State records indicated was either not in existence or was not registered to an owner on the date of the alleged assist (*Attachment O*).

In addition to those 25 Assist Reports, investigators discovered 20 others submitted by Mr. McKeon in the three-month period reviewed that listed a license plate that appeared on at least one other Assist Report submitted by Mr. McKeon during the period reviewed. Notably, Mr. McKeon reported assisting one vehicle six separate times, and two other vehicles twice in the same day (*Attachment P*).

## **2. Review of Mr. McKeon's 2013 Assist Reports**

Investigators also reviewed hundreds of Assist Reports submitted by Mr. McKeon from May 1 to September 30, 2013. Although Mr. McKeon did not report assisting any license plate on more than one occasion or submit multiple Assist Reports beginning with the same five or six digits, investigators did notice that Mr. McKeon consistently reported assists occurring on the hour and 33 minutes after the hour, and assists lasting for exactly 11 minutes. In fact, in a randomly selected sample of nine days' worth of Assist Reports—totaling 129 Assist Reports—submitted by Mr. McKeon during this five-month period,<sup>41</sup> investigators noted that 122 followed this formula. Specifically:

- 62 assists begin on the hour and end at 11 minutes after;
- 58 assists begin at 33 minutes after the hour and end at 44 minutes after; and
- 2 additional assists also last 11 minutes.

## **3. June 2013 Surveillance of Mr. McKeon and Review of Mr. McKeon's Corresponding Assist Reports**

On June 20 and 24, 2013, three to four teams of OEIG investigators conducted surveillance of Mr. McKeon. On June 20, investigators conducted surveillance of Mr. McKeon throughout his entire workday; on June 24, investigators were only able to conduct surveillance from 11:35 a.m. until the end of his workday at approximately 1:00 p.m.<sup>42</sup> Investigators

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<sup>41</sup> Investigators randomly selected three days each in May, June, and July 2013, and reviewed all of the Assist Reports submitted by Mr. McKeon on these days. In total, Mr. McKeon submitted 129 Assist Reports over the course of these nine days.

<sup>42</sup> On June 20, 2013, OEIG investigators lost visual contact of Mr. McKeon between 8:30 a.m. and 8:49 a.m., and 9:31 a.m. and 9:37 a.m. On both occasions, OEIG investigators found Mr. McKeon's truck parked in or near a forest preserve. On June 24, 2013, Mr. McKeon reported assisting 12 vehicles between the hours of 5:33 a.m. and 11:33 a.m. OEIG investigators did not begin their surveillance of Mr. McKeon until 11:35 a.m. and, therefore, could not verify activity related to those 12 assists.

recorded their observations as they occurred, and had access to the radio frequency used by the ETP drivers, supervisors, and the IDOT District One Communications Command Center.

After conducting surveillance, investigators obtained copies of the Assist Reports Mr. McKeon submitted for the days of surveillance. Highlights of the OEIG's observations during surveillance and the information contained on Mr. McKeon's corresponding Assist Reports are discussed below.

#### **June 20, 2013 Surveillance**

- Mr. McKeon was off the expressway for 2 hours and 20 minutes during his shift;
- During this time, he was parked at the Edens Office Plaza, on various side streets, and near a pond at the Skokie Lagoons;
- Mr. McKeon was observed driving at high rates of speed on expressway shoulders despite not being en route to any assists;
- Mr. McKeon was observed passing motorists stopped on the expressway shoulders and ramps; and
- Mr. McKeon was observed performing only 4 assists, although he submitted 14 Assist Reports (*Attachment Q*).

#### **June 24, 2013 Surveillance**

- During the approximate hour and a half that Mr. McKeon was under surveillance, he was off the expressway for 37 minutes.
- During this time, Mr. McKeon was parked at the Edens Office Plaza and at various Accident Investigation Sites;
- Mr. McKeon was observed driving at high rates of speed on expressway shoulders despite not being en route to any assists;
- Mr. McKeon was observed passing motorists stopped on the expressway shoulders and ramps; and
- Mr. McKeon was observed performing zero assists; he reported two assists during this time period (*Attachment R*).

In total, investigators observed Mr. McKeon perform only 4 assists on the days of surveillance, although he submitted 16 Assist Reports for assists reportedly performed during the periods he was under surveillance. After reviewing these 16 Assist Reports, investigators discovered that all 16 were either entirely false—that is, the assist never happened—or reflected an assist that did occur, but contained false or inaccurate information, such as an incorrect license plate number, an incorrect location of assist, or an incorrect time of assist.

Investigators also noticed that the Assist Reports submitted by Mr. McKeon on the days of surveillance showed he consistently assisted vehicles on the hour and 33 minutes after the hour each day. Additionally, these Assist Reports indicated each assist took 11 minutes to complete. Of the 28 Assist Reports submitted by Mr. McKeon on the two days the OEIG conducted surveillance, 26 fit this pattern. Specifically:

- 13 assists begin on the hour, and end at 11 minutes after; and
- 13 assists begin at 33 minutes after the hour, and end at 44 minutes after.

#### **4. Interview of Mr. McKeon**

On August 12, 2015, investigators interviewed Kevin McKeon. Investigators reviewed IDOT and ETP policies with Mr. McKeon, as well as numerous Assist Reports that he has submitted during his time as an ETP driver. Mr. McKeon acknowledged that the 192 Assist Reports<sup>43</sup> investigators presented were his, and that he was the person who filled them out. After showing Mr. McKeon several Assist Reports from 2011 listing the same and similar license plate numbers, Assist Reports listing a license plate number whose owner denied receiving assistance, and showing Mr. McKeon evidence gathered during surveillance, Mr. McKeon admitted that he:

- submitted Assist Reports for assists that never occurred; and
- submitted Assist Reports for assists that did occur but had inaccurate information included.

Mr. McKeon told investigators that he had been submitting false and inaccurate Assist Reports since 2010, and continued doing so until a few months prior to his OEIG interview. Mr. McKeon stated that he submitted false Assist Reports because he wanted to meet the quota set forth by management, keep his work reports neat and error-free, and be efficient. Mr. McKeon stated that the “inherent culture” of the ETP instills in drivers the desire to keep their number of assists up; however, he did not know if other drivers were actually submitting false Assist Reports. Mr. McKeon also stated that he was not aware if supervisors knew drivers were submitting false Assist Reports. Ultimately, Mr. McKeon stated that he knew falsifying Assist Reports was a violation of IDOT and ETP policies.

Mr. McKeon additionally stated that sitting on a side street or in a parking lot for an extended period of time would not be him performing his duties to the best of his ability, as required by IDOT policy. Mr. McKeon stated that aside from the two formal fifteen-minute breaks and one thirty-minute break afforded drivers, it is permissible for a driver to stop for brief periods of time during the shift to complete paperwork or regenerate the truck’s emission control system. Mr. McKeon stated that the truck’s emission control system may need to be regenerated two or three times a day, and takes approximately twenty minutes per occurrence. Mr. McKeon stated that he will stay on the expressway or in an Accident Investigation Site when regenerating his truck, and will discontinue regeneration if he receives a call for assistance.

#### **C. OEIG Investigation Of ETP Highway Maintainer Andrew Casper**

Investigators reviewed all Assist Reports submitted by ETP Highway Maintainer Andrew Casper from January 31, 2011 to April 30, 2011, and from May 1, 2013 to September 30, 2013.<sup>44</sup>

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<sup>43</sup> These Assist Reports are detailed in *Attachments N through R*.

<sup>44</sup> Investigators identified Assist Reports filled out by Mr. Casper based on his Patrolman Number, listed on each Assist Report.

## **1. Review of Mr. Casper's 2011 Assist Reports**

Between January 31 and April 30, 2011, Mr. Casper submitted 244 Assist Reports. Investigators reviewed each of these Assist Reports, and discovered that numerous listed a license plate that either appeared on more than one Assist Report submitted by Mr. Casper during this period, or listed a license plate that was noticeably similar to at least one other license plate used by Mr. Casper during this period. After obtaining and reviewing Secretary of State records, and conducting interviews of several registered owners of these license plates, investigators concluded that 150 of these Assist Reports were entirely false or contained inaccurate information. Specifically, investigators determined that:

- 26 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (*Attachment S*); and
- 72 listed a license plate that Secretary of State records indicated was not registered to any owner on the date of the alleged assist (*Attachment T*).

In addition, the OEIG identified 52 Assist Reports submitted by Mr. Casper that listed a license plate that appeared more than once on his 2011 or 2013 Assist Reports (*Attachment U*).

## **2. Review of Mr. Casper's 2013 Assist Reports**

The OEIG also obtained and reviewed all of Mr. Casper's submitted Assist Reports from May 1 to September 30, 2013. Investigators determined that more than 350 of these Assist Reports were questionable because they contained a license plate that either appeared on more than one Assist Report during this period, or was noticeably similar to another license plate used during this period. Investigators also noticed that many of the license plates listed on Mr. Casper's 2013 Assist reports appeared on his 2011 Assist Reports, as well. Given the many recurring license plates and the many license plates with noticeable similarities, investigators sought to determine the validity of these license plates. Ultimately, investigators discovered that:

- 36 Assist Reports listed a license plate whose registered owner denied receiving assistance (*Attachment V*);<sup>45</sup> and
- 133 listed a license plate that Secretary of State records indicated was either not in existence or was not registered to an owner on the date of the alleged assist (*Attachment W*).<sup>46</sup>

Investigators also discovered a large number of additional Assist Reports submitted by Mr. Casper in 2013 that did not fall into one of the above categories, but still raised suspicion. Specifically, 15 Assist Reports—all submitted on one of two days—did not list a license plate at all (*Attachment Y*).<sup>47</sup> An additional 174 Assist Reports listed a license plate that:

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<sup>45</sup> Six of these license plates also appeared on Mr. Casper's Assist Reports in 2011, and their owners denied contact with Mr. Casper or ETP at that time, as well.

<sup>46</sup> Ten of these license plates also appeared on Mr. Casper's Assist Reports in 2011, and had no owner of record on file at that time, either.

<sup>47</sup> As noted in *Attachment Y*, five of these Assist Reports do indicate the assist is for "debris." This means no vehicle was involved in the assist, and therefore, no license plate is expected on the Assist Report.

- appeared on at least one other Assist Report during the time period reviewed;
- was noticeably similar to another license plate that appeared on a 2013 Assist Report; and/or
- also appeared on at least one Assist Report submitted by Mr. Casper in 2011 (*Attachment X*).<sup>48</sup>

### **3. Interview of Mr. Casper**

On August 13, 2015, investigators interviewed Andrew Casper. Investigators reviewed IDOT and ETP policies with Mr. Casper, as well as numerous Assist Reports that he has submitted during his time as an ETP driver. Mr. Casper acknowledged that the 508 Assist Reports<sup>49</sup> investigators presented were his, and that he was the person who filled them out. After showing Mr. Casper several Assist Reports listing the same license plate number and Assist Reports listing similar license plate numbers with only one or two numbers transposed, Mr. Casper admitted that he:

- submitted Assist Reports for assists that never occurred; and
- submitted Assist Reports for assists that did occur but had inaccurate information included.

Mr. Casper told investigators that he had been submitting false and inaccurate Assist Reports since he began working at IDOT in 2007, and was still doing so at present. Mr. Casper told investigators that he does patrol the expressways and perform assists like he is supposed to, but does not want to come into the ETP yard with a low number of assists. Mr. Casper stated that he has a list of license plate numbers he uses when filling out false Assist Reports, and provided the OEIG with this list upon request.<sup>50</sup> Mr. Casper informed investigators that he believed all ETP drivers were falsifying Assist Reports, and stated that ETP drivers talk about submitting false Assist Reports on an ongoing basis. Mr. Casper stated that ETP supervisors know drivers are submitting false Assist Reports because they were drivers once too, and because Mr. Casper has personally informed his supervisors that he was submitting false Assist Reports in the past.<sup>51</sup> Mr. Casper stated that he knew falsifying Assist Reports was a violation of IDOT and ETP policies.

### **D. Investigation Of ETP Highway Maintainer Robert Matthews**

Investigators reviewed Assist Reports submitted by Highway Maintainer Robert Matthews from January 31 to April 30, 2011, and from May 1 to September 30, 2013.<sup>52</sup>

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<sup>48</sup> For example, Mr. Casper listed license plate 7242629 on 10 Assist Reports in 2013. That license plate was also listed on three Assist Reports submitted by Mr. Casper in 2011, and is noticeably similar to license plate 7242929, which Mr. Casper also listed on an Assist Report in 2013. Therefore, this license plate meets all three criteria.

<sup>49</sup> These Assist Reports are detailed in *Attachments S* through *Y*.

<sup>50</sup> Investigators identified several numbers on this “cheat sheet” as numbers used on numerous Assist Reports submitted by Mr. Casper in 2011 and 2013.

<sup>51</sup> Mr. Casper said he first informed a supervisor of this in 2010, and then mentioned it to other supervisors in passing over the following years.

<sup>52</sup> Investigators identified Mr. Matthews’ Assist Reports by his Patrolman Number, listed on each Assist Report.

Investigators also conducted surveillance on Mr. Matthews on two separate days in October 2014. The details of the OEIG's investigation of Mr. Matthews follows.

## **1. Review of Mr. Matthews' 2011 Assist Reports**

Between January 31 and April 30, 2011, Mr. Matthews submitted 659 Assist Reports. Investigators reviewed each of these Assist Reports, and discovered that numerous Assist Reports listed a license plate that either appeared on more than one Assist Report submitted by Mr. Matthews during this period, or listed a license plate that was noticeably similar to at least one other license plate used by Mr. Matthews during this period. After obtaining and reviewing Secretary of State records, and conducting interviews of several registered owners of these license plates, investigators concluded that 161 of these Assist Reports were entirely false or contained inaccurate information. Specifically, investigators determined that:

- 17 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (*Attachment Z*); and
- 144 additional Assist Reports listed a license plate that appeared on more than one Assist Report submitted by Mr. Matthews during the period reviewed (*Attachment AA*).

Investigators discovered that Mr. Matthews used 64 different license plate numbers on more than one occasion in the months reviewed. Moreover, investigators observed that all but 10 of these license plates numbers were not only assisted by Mr. Matthews on more than one occasion, but were assisted on more than one occasion for an accident. That is, Mr. Matthews reported assisting 54 different vehicles for multiple accidents in the three-month period reviewed.<sup>53</sup> Notably, investigators also discovered that a large number of Mr. Matthews' reported accidents involved the same vehicles. That is, according to Mr. Matthews' Assist Reports, several vehicles were involved in more than one accident with each other on separate dates. In fact, Mr. Matthews reported assisting at least seven sets of vehicles for multiple accidents during the three months reviewed.

## **2. Review of 2013 Assist Reports**

The OEIG also obtained and reviewed 747 Assist Reports submitted by Mr. Matthews from May 1 to September 30, 2013. Investigators determined that:

- 9 Assist Reports listed a license plate whose registered owner denied receiving assistance from IDOT (*Attachment BB*); and
- 34 other Assist Reports listed a license plate number that appeared on at least one other Assist Report submitted by Mr. Matthews during this period (*Attachment CC*).

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<sup>53</sup> As indicated in *Attachment AA*, the remaining 10 license plates were either assisted for: 1) an accident and something else, such as tire or cooling system; or 2) two assists aside from an accident.

### **3. 2014 Surveillance of Mr. Matthews and Review of Corresponding Assist Reports**

On October 2 and 3, 2014, teams of OEIG investigators conducted surveillance of Mr. Matthews throughout his regular workday shift and a voluntary overtime shift. Investigators recorded their observations as they occurred, and had access to the radio frequency used by the ETP drivers, supervisors, and the IDOT District One Communications Command Center.

After conducting surveillance, investigators obtained copies of the Assist Reports Mr. Matthews submitted for the days of surveillance. Highlights of the OEIG's observations during surveillance and the information contained on Mr. Matthews' corresponding Assist Reports are discussed below.

#### **October 2, 2014 Surveillance**

- Throughout his shift and during voluntary overtime, investigators observed Mr. Matthews conducting numerous assists, ranging from tire changes to debris pick-up to accident assistance;
- Mr. Matthews was observed performing 11 assists;<sup>54</sup> and
- submitted 12 Assist Reports.

Investigators discovered that only one of Mr. Matthews' Assist Reports did not match anything they observed – that is, he submitted an Assist Report for an assist that did not happen—and four of his Assist Reports reflected assists that actually occurred, but contained inaccurate information.<sup>55</sup>

#### **October 3, 2014 Surveillance**

- Throughout his shift and during voluntary overtime, investigators observed Mr. Matthews conducting numerous assists, ranging from tire changes to debris pick-up to accident assistance;
- Mr. Matthews was observed performing 20 assists;<sup>56</sup> and
- submitted 13 Assist Reports.

### **4. Interview of Mr. Matthews**

On July 15, 2015, investigators interviewed Robert Matthews. Investigators reviewed IDOT and ETP policies with Mr. Matthews, as well as numerous Assist Reports that he has submitted during his time as an ETP driver. Mr. Matthews acknowledged that the 341 Assist

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<sup>54</sup> Investigators observed Mr. Matthews assist with 8 separate incidents; three of those incidents involved two vehicles each.

<sup>55</sup> Two of these Assist Reports were for cars that were not actually in accidents Mr. Matthews did assist with, and two contained inaccurate information such as a wrong license plate or type of assist.

<sup>56</sup> Investigators observed Mr. Matthews assist with 15 separate assists; three of those incidents involved more than one vehicle.

Reports<sup>57</sup> investigators presented were his, and that he was the person who filled them out. After showing Mr. Matthews several examples of Assist Reports listing the same license plate number, Mr. Matthews admitted that he:

- submitted Assist Reports for assists that never occurred; and
- submitted Assist Reports for assists that did occur but had inaccurate information included.

Mr. Matthews told investigators that he had been submitting false and inaccurate Assist Reports since he began working at IDOT in 2006, and was still doing so at present. Mr. Matthews told investigators that he began falsifying Assist Reports to meet the quota imposed by management when he has had a “dry day,” because he did not want to be accused of not doing his job. Mr. Matthews stated that “people got to do what people got to do” when asked if other ETP drivers were also falsifying Assist Reports. Mr. Matthews then stated that ETP supervisors would have to be aware that drivers are doing this because they know when it is a light day on the roads. Mr. Matthews stated that he knew falsifying Assist Reports was a violation of IDOT and ETP policies.

#### **E. Interviews Of Additional ETP Drivers**

Between August 26 and September 15, 2015, investigators interviewed additional drivers who worked the same shift except for Jerome Lockhart. The drivers were interviewed about their knowledge of, among other things, the assist quota at ETP and the falsification of Assist Reports. Specifically, investigators interviewed the following individuals:

<u>Name</u>	<u>Years with ETP</u>
David Alcantar	9
Dimitrius Coleman	10
Sean Huber	13
Jerome Lockhart	16
Francois Mendez	7
Michael Piwcewicz	13

These drivers, except for Mr. Piwcewicz,<sup>58</sup> admitted to the following during their respective interview:

- Each admitted to regularly falsifying Assist Reports during their employment with ETP;

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<sup>57</sup> These Assist Reports are detailed in *Attachments Z through CC*.

<sup>58</sup> During his interview, Mr. Piwcewicz denied any knowledge of a quota system currently in place at ETP, denied ever hearing any supervisor talk to a driver about the number of Assist Reports submitted, denied knowledge that ETP drivers were submitting falsified Assist Reports, and denied having ever submitted a falsified Assist Report himself. Mr. Piwcewicz did, however, admit that he likely submitted Assist Reports containing inaccurate information on a daily basis from the beginning of his employment with ETP in 2002 until approximately May 2015.

- Mr. Alcantar, Mr. Coleman, and Mr. Mendez stated that they had been falsifying Assist Reports since they began at ETP, and Mr. Alcantar and Mr. Coleman additionally stated that they were taught to falsify Assist Reports by other ETP drivers;
- Mr. Huber and Mr. Lockhart could not provide specific dates for when they began submitting falsified Assist Reports, though Mr. Huber stated he had been doing so “for some time,” and Mr. Lockhart said he had been doing so for “a couple of years”;
- Each stated that while they had submitted falsified Assist Reports during their employment, they had stopped anywhere from one year to just days prior to their OEIG interviews;
- Each driver explained that they are repeatedly reminded by supervisors that they are expected to come in with a certain number of assists per shift—anywhere from 8 to 12—and that drivers are regularly told to get their “numbers” up;
- Mr. Alcantar, Mr. Huber, Mr. Mendez, and Mr. Lockhart stated that they have either seen supervisors talk negatively to or treat poorly drivers who have come in with fewer assists than the set quota, including being stared down by supervisors, being told they are not team players, getting their “ear chewed off,” and being written up;
- Each explained that the reason they make up assists is because they want to come in with the number the ETP managers want in order to meet the quota;
- All except Mr. Lockhart also admitted to regularly submitting Assist Reports for assists that actually occurred, but that contained inaccurate information, such as license plate numbers, times of assists, locations of assists, and more; and
- All admitted that they either knew submitting Assist Reports containing false and inaccurate information was a violation of IDOT policy, or at least admitted that they knew at the time they were falsifying Assist Reports that what they were doing was wrong.

In addition, Mr. Alcantar, Mr. Mendez, and Mr. Lockhart stated that they believe their ETP supervisors are aware that drivers make up Assist Reports. Specifically, Mr. Alcantar and Mr. Lockhart told investigators that the supervisors would have to know drivers are making up assists and submitting falsified Assist Reports because the supervisors were drivers themselves once and this practice has been going on for so long. Additionally, Mr. Alcantar, Mr. Mendez, and Mr. Lockhart stated that the supervisors would have to know, too, because there are days when the ETP radio traffic is light—meaning drivers are not calling in many assists—but drivers are then coming in with numerous Assists Reports.

## **F. OEIG Interviews Of IDOT And ETP Management**

During the investigation, the OEIG also interviewed IDOT and ETP administrators and supervisors to better understand how this program was being operated and whether these

managers were aware of the amount of false reporting taking place. Although most denied knowing about the false reporting, their responses indicate that the supervisors chose to ignore this issue or did not care about the accuracy of assist reporting.

Specifically, investigators interviewed the following individuals:

- Steve Travia, former Bureau Chief, IDOT District One Bureau of Traffic
- Michael Schivarelli, Operations Manager, IDOT District One Bureau of Traffic
- James McKay, ETP Equipment Manager
- John Gonzalez, ETP Patrol Manager
- Zenon McHugh, ETP Lead Lead Worker
- Robin Thorpe, ETP Lead Worker
- Joseph Huante, ETP Lead Worker

The comments of these individuals regarding several topics, including the supervision of ETP drivers, the daily assist quota, Assist Report accuracy, and the falsification of Assist Reports are detailed below.

### **Supervisor Duties**

Lead Workers Robin Thorpe and Joseph Huante explained that as Lead Workers, their responsibilities include patrolling expressways, overseeing the activities of the ETP drivers, assisting motorists, and completing shift paperwork. Mr. Thorpe summed up the duties of an ETP supervisor by stating they “do basically the same thing as drivers,” in addition to paperwork. Meanwhile, Lead Lead Worker Zenon McHugh stated that Lead Lead Workers perform the same day-to-day duties as Lead Workers. Mr. McHugh also stated that his responsibilities as a Lead Lead Worker are to keep the ETP drivers safe and ensure the shift he is supervising runs as a cohesive unit.

### **Lack of Supervisor Experience and Training**

Mr. Gonzalez stated that he began employment with IDOT as the ETP Patrol Manager in 2012. Mr. Gonzalez stated that he had no prior full-time managerial experience before coming to ETP, and did not receive any formal training when he was hired.

Mr. McHugh and Mr. Thorpe stated that they became ETP supervisors in approximately 2007 or 2008, and Mr. Huante stated that he began as an ETP supervisor in 2013. Each of these individuals similarly stated that they received no formal supervisory training when they became ETP supervisors, with Mr. Thorpe explaining that the only training ETP supervisors really get is “on-the-job training” as “you come up through the ranks.” Nevertheless, Mr. McHugh and Mr. Thorpe stated that they did ride along with an experienced supervisor when they were promoted to observe how that supervisor worked, and, along with Mr. Huante, stated that they were shown how to fill out paperwork when they began as supervisors.

### **No Supervision of Drivers' Patrol Routes**

Lead Workers Robin Thorpe and Joseph Huante both told investigators that monitoring the ETP drivers is not an easy task. Mr. Thorpe explained that while the Lead Workers are expected to know where their drivers are throughout the shift, it is hard because the drivers are constantly moving. Mr. Huante stated that while he does try to monitor his drivers via the ETP radio frequency, the way things are set up now at ETP allows drivers to get away with not patrolling and making up assists. Mr. Thorpe similarly commented that it is possible a driver could be off the expressway for hours and no one would know.

Meanwhile, Lead Lead Worker Zenon McHugh stated that he does not know whose responsibility it is to ensure drivers are actually patrolling. Mr. McHugh said he generally does not know what drivers are doing during a shift, and does not think the Lead Workers are doing anything to ensure drivers are doing their jobs either. Mr. McHugh explained that Lead Workers are not expected to keep track of the calls a driver receives, the assists a driver performs, or the breaks a driver takes during his shift. Instead, Mr. McHugh stated that the only way a supervisor would actually know if a driver was not performing his or her patrolling duties properly would be if the supervisor found that driver sitting somewhere he or she was not supposed to be. Mr. McHugh stated that he has never informed his supervisor, Mr. Gonzalez, that drivers might not be doing what they are supposed to be doing.

ETP Patrol Manager John Gonzalez told investigators that he has never asked the Lead Lead or Lead Workers to ensure that the ETP drivers are out patrolling and doing their jobs.

### **No Supervisor Review of Assist Reports**

ETP Patrol Manager Gonzalez informed investigators that “paperwork is very important,” and said it is his expectation that the ETP drivers document their assists truthfully and accurately. Mr. Gonzalez explained that he tells the Lead Lead and Lead Workers to tell the drivers during shift meetings that it is important to be accurate and honest when completing daily paperwork, and added that if a driver was not truthful in completing paperwork, the driver would be written up. Similarly, ETP Equipment Manager James McKay stated that the ETP drivers are responsible for ensuring the accuracy of their Assist Reports, and said that the accuracy of Assist Reports is “crucial.” In addition, several ETP supervisors and managers informed investigators that drivers are called to court to testify regarding traffic incidents they assisted with or witnessed while on shift, and that the prosecution often requests any documentation ETP has of the incident. Lead Lead Worker Zenon McHugh added that while Assist Reports themselves are not often used as evidence in court, the ETP drivers regularly review the relevant Assist Report to refresh their recollection in preparation for providing testimony.

Despite telling investigators that the accuracy of Assist Reports is important, both Mr. Gonzalez and Mr. McKay told investigators that Assist Reports are never reviewed. Mr. Gonzalez stated that he does not expect the Lead Lead or Lead Workers to review Assist Reports, and said he has never asked them to do so. Mr. Gonzalez told investigators that ETP is “basically on the honor system,” with management assuming that the driver Assist Reports are coming in truthfully. Mr. McKay similarly told investigators that the supervisors rely on the

drivers to be honest when completing their Assist Reports. Additionally, though he was not asked about the importance of Assist Report accuracy, Bureau Operations Manager Michael Schivarelli confirmed that Assist Reports are not reviewed.

Mr. McHugh, Lead Worker Robin Thorpe, and Lead Worker Joseph Huante also told investigators that driver Assist Reports are only reviewed to ensure they are filled out, and not for accuracy. Mr. McHugh told investigators, "It's not my job to check them [Assist Reports]," and stated that it is nobody else's job at ETP to ensure they are truthful and accurate either. Mr. McHugh, Mr. Thorpe, and Mr. Huante each told investigators that they are *not* concerned about the accuracy of driver Assist Reports, and did not think anyone was concerned about accuracy. Mr. McHugh further told investigators, "I don't care about assist sheets," and stated that drivers are *not* reminded to be accurate when completing paperwork. Mr. McHugh also added that he has never told the ETP drivers not to make up or falsify their Assist Reports because doing so is "above [his] pay grade."

Mr. McHugh, Mr. Thorpe, and Mr. Huante also noted that it is the responsibility of the oncoming shift supervisor to collect the off-going shift's Assist Reports. Mr. Thorpe and Mr. Huante explained that because the supervisor collecting Assist Reports was not on duty while those assists occurred, he would not know if the assists actually occurred. Nevertheless, each of these supervisors, as well as Mr. Gonzalez, admitted that if supervisors did review Assist Reports, it *would* be possible to find out if drivers were submitting falsified Assist Reports, with more than one stating that instances of repeated license plates, similar license plates, and other patterns in the information reported would be noticeable.

### **Enforcement of Assist Quotas**

Each of the administrators and supervisors interviewed told investigators that there is an informal quota at ETP for the number of assists a driver is expected to perform each shift, although Mr. Travia explained that there is no "formal" quota because that would give the drivers an incentive to "make stuff up." All three of the ETP supervisors interviewed stated that they are regularly told by Patrol Manager John Gonzalez to inform their drivers of the assist quota and remind them of the need to get this number of assists. The supervisors said they repeatedly relay this information to their drivers during shift meetings.

In addition, all three of the ETP supervisors stated that every month, Mr. Gonzalez provides them with a list of drivers who have not met the quota, and Mr. Gonzalez tells the supervisors to talk to these drivers about getting their assist numbers up. Mr. Gonzalez told investigators that he believes the quota requirements are fair, and expects the supervisors to make sure the drivers on the monthly list have a higher number of assists the following month. Investigators obtained and reviewed a copy of one of these lists, disseminated to the ETP supervisors by Mr. Gonzalez, listing drivers who did not meet either the number of assists required by management or the number of miles required by management. This sheet, from April 2015, clearly denoted at the top that the number of assists ETP drivers on the afternoon and evening shifts are expected to perform is 12 each day.

Given the focus on assist numbers and productivity, Lead Lead Worker Zenon McHugh acknowledged that drivers might feel pressure to keep their numbers up. Lead Worker Robin Thorpe, Mr. Gonzalez, and Mr. McKay also admitted it is possible that drivers pad their number of assists with made-up assists because they are told to bring their numbers up, and Mr. Gonzalez acknowledged this possibility that a driver could be meeting the assist goal by falsifying his assists. Finally, Lead Worker Joseph Huante told investigators that he believes the assist quota has encouraged drivers to pad their numbers, because if there was not a quota to meet, there would be no reason for drivers to feel the need to pad their numbers.

### **Knowledge of Assist Report Falsification**

Due to the admitted possibility that drivers could be falsifying Assist Reports, the ETP supervisors and Mr. Gonzalez were questioned about their actual knowledge of drivers falsifying Assist Reports.

Mr. Gonzalez told investigators that he was unaware of drivers falsifying Assist Reports, and was unaware of any Assist Report containing even an error or mistake since he began with the ETP unit.

Mr. McHugh told investigators that he has heard “shop talk” amongst drivers regarding the falsification of Assist Reports, but has never inquired into the comments because “it’s not my job to check them [Assist Reports].” Mr. McHugh added that he does not want to know if drivers are actually falsifying their Assist Reports, and stated, “If no one is looking, it’s not a problem.”

Mr. Thorpe similarly stated that he had heard drivers might have been falsifying Assist Reports when he was a driver, but did not know for sure. Nevertheless, Mr. Thorpe admitted that as a supervisor, there are days when he thinks his drivers have made up assists. Mr. Thorpe explained that he has been with ETP long enough to know that certain days and assignments are slow, and sometimes drivers will come in with more assists on these days or assignments than he thinks they should. However, Mr. Thorpe stated that he has never told anyone about his suspicions, and has not done anything about it because he cannot prove that they are making them up.

Finally, Mr. Huante stated that drivers made up Assist Reports when he was a driver, and admitted to falsifying “a couple” himself. Mr. Huante stated that none of the drivers he supervises have told him they are falsifying Assist Reports, but admitted that he does not think the practice of falsifying Assist Reports stopped when he became a supervisor. Nevertheless, Mr. Huante told investigators that he has never brought the possibility of drivers falsifying Assist Reports to any of his superiors, and is afraid they would think he was trying to cause problems if he did.

### **ETP’s Reliance on Assist Report Data**

Stephen Travia, the IDOT District One Traffic Bureau Chief, told investigators that the number of assists performed by ETP drivers is the basis for and provides justification for the

entire ETP program. Bureau Operations Manager Michael Schivarelli, ETP Equipment Manager James McKay, and ETP Patrol Manager John Gonzalez offered similar sentiments, stating that the number of assists performed by drivers is used to gauge the productivity of ETP. In addition, several of the individuals interviewed explained that the data extracted from Assist Reports is also used in the following ways:

- for budget purposes and to obtain funding for the ETP program;
- to inform ETP personnel decisions; and
- as a measure on ETP drivers' annual evaluations.

Specifically, Mr. McKay told investigators that he and Mr. Schivarelli use the number of assists the ETP drivers are performing as a basis to try to get more money for the ETP program. Mr. Travia explained that reports created from Assist Report data can be used to inform personnel decisions, such as the filling of vacancies, and can also be used to justify the number of trucks ETP has or needs.

Several of the individuals interviewed also informed investigators that the number of assists a driver performs is used for the ETP driver evaluations, with Mr. Gonzalez explaining that the higher the number of assists the driver has performed during the year, the better that driver's evaluation. However, Mr. Gonzalez acknowledged that management is assuming that a driver's number of assists is accurate when administering the evaluation.

## **V. ANALYSIS**

The IDOT ETP unit provides 24/7 assistance and emergency vehicle services to the motoring public on the Chicagoland area expressways 365 days a year. Employing more than 70 drivers and over a dozen supervisors and staff, the ETP unit reported 124,166 assists in 2014, ranging from tire changes and towing to debris clean-up, accident assistance, and more. However, the OEIG investigation into the ETP unit and the assistance revealed that ETP drivers have been, for years, inflating the number of assists performed by submitting Assist Reports for assists that never happened at all, and also submitting numerous other Assist Reports containing inaccurate information.

### **A. Review Of Relevant Policies**

The IDOT Personnel Policies Manual "Truth in Reporting" provision states that "Employees are expected to report accurately and truthfully all information pertaining to employment, including but not limited to . . . and any written reports[.]"<sup>59</sup> In addition, the IDOT ETP Policy and Procedure Manual states that the "[i]ntentional falsification of any personnel or working record" is a work rule violation "for which disciplinary action may be taken."<sup>60</sup>

The IDOT Personnel Policies Manual has a "Work Performance" provision that provides:

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<sup>59</sup> *IDOT Personnel Policies Manual*, 10-3(W).

<sup>60</sup> *IDOT Emergency Traffic Patrol Policy and Procedure Manual*, Article 1.16.

Employees shall perform their duties to the best of their abilities and cooperate with others in the performance of their duties as assigned. Inattention to work, including but not limited to, sleeping, loitering or loafing shall not be tolerated. Employees are expected to possess and demonstrate the skills and abilities necessary to perform the duties and responsibilities of their position. Work assignments shall be completed accurately, in a timely fashion and with good workmanship and judgment.<sup>61</sup>

Lastly, the IDOT Personnel Policies Manual states that “[s]upervisors are expected to exercise proper supervision over subordinates,” and “shall take corrective action when warranted and address/report misconduct and/or rule violations of subordinates in a fair, consistent, and equitable manner.”<sup>62</sup>

## **B. Submission Of False Assist Reports By ETP Drivers**

During the course of the investigation, the OEIG first discovered that four ETP drivers submitted numerous Assist Reports over the course of several months that listed the same or substantially similar license plate numbers; that is, these drivers reported assisting the same vehicles on multiple occasions, as well as other vehicles bearing almost identical license plate numbers. The OEIG conducted numerous interviews with individuals allegedly assisted by these drivers and conducted surveillance on several drivers, as well. Ultimately, the OEIG found that each of these four drivers were submitting falsified Assist Reports for assists that never occurred, as well as Assist Reports containing inaccurate information for assists that did occur. In addition, investigators discovered that two of the drivers investigated were not actually out on the roads patrolling and conducting assists during significant portions of their shift, and were instead parked well off the expressways, not assisting any motorists or performing ETP work. Finally, investigators interviewed the four ETP drivers initially investigated, as well as several additional ETP drivers selected at random, and each admitted to either submitting false Assist Reports for years to ensure that their productivity satisfied management, or submitting numerous Assist Reports containing inaccurate information. Each of the drivers investigated by the OEIG during its comprehensive investigation is discussed individually below.

### **1. ETP Driver John Shealey**

The OEIG reviewed hundreds of Assist Reports submitted by Mr. Shealey during a three-month period in 2011, and a five-month period in 2013. The 183 Assist Reports contained in *Attachments C-G* and *Attachments K-M*, each submitted by Mr. Shealey during this combined eight-month period, were either entirely false, with a corresponding assist having never taken place at all, or contained information that did not accurately reflect an assist that did occur. As shown in the charts, the license plates listed in the Assist Reports either did not exist at the time of the assist, vehicle owners’ denied receiving any ETP assistance, or the license plate numbers were used multiple times or in a similar repetitive series. In addition, investigators determined that on the three days that the OEIG conducted surveillance, Mr. Shealey submitted an additional

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<sup>61</sup> IDOT Emergency Traffic Patrol Policy and Procedure Manual, Article 1.16.

<sup>62</sup> IDOT Personnel Policies Manual, 10-2.

27<sup>63</sup> Assist Reports for assists that either never actually took place or that inaccurately reflected an assist that did occur. That is, at least 27 of the 28 Assist Reports submitted by Mr. Shealey on the days he was under surveillance did not accurately reflect anything he did those days. Finally, Mr. Shealey admitted to investigators that he had been submitting false Assist Reports—that is, Assist Reports for assists that never occurred—and Assist Reports containing inaccurate information since he began employment at ETP in 2002, and continued doing so up until the time of his interview in July 2015.

The fact that Mr. Shealey submitted almost 200 false or inaccurate Assist Reports during just an eight-month period, paired with his admission that he had been regularly submitting false and inaccurate Assist Reports during his entire 13-year career as an ETP driver, makes it likely that Mr. Shealey submitted thousands of false and inaccurate Assist Reports during his employment with ETP.

Based on this evidence, the allegation that Mr. Shealey submitted false Assist Reports for assists that never took place from 2002 to 2015 in violation of IDOT’s “Truth in Reporting” policy is **FOUNDED**.<sup>64</sup> In addition, the allegation that Mr. Shealey submitted false Assist Reports for assists that never took place from 2002 to 2015 in violation of ETP’s rule against the intentional falsification of working records is **FOUNDED**. Furthermore, based on the foregoing evidence, the allegation that Mr. Shealey submitted inaccurate Assist Reports—that is, Assist Reports reflecting actual assists that occurred but containing inaccurate information, such as license plate, time of assist, location of assist, and more—on a regular basis from 2002 to 2015 in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

As previously discussed, during the investigation, the OEIG conducted surveillance on Mr. Shealey over the course of three separate days in June 2013. In total, Mr. Shealey submitted 28 Assist Reports for assists allegedly performed throughout his shifts on these three days; however, investigators observed Mr. Shealey perform only 17 assists during the entire three-day period surveilled (although, as previously noted, the corresponding Assist Reports do not accurately reflect even these actual assists). Ultimately, instead of performing actual work, investigators observed Mr. Shealey parked off the expressway not performing work duties for three or more hours each day, passing vehicles on the expressway shoulders and ramps without stopping to provide assistance, and failing to respond to assignments from dispatch, among other things.

Given that Mr. Shealey failed to perform his work duties for an extended period of time on June 11, 2013 while he was under surveillance, the allegation that Mr. Shealey committed the ETP rule infraction of using “work time for other than work purposes” by being off the expressway, not performing work duties for 2 hours and 58 minutes on June 11, 2013 is **FOUNDED**.

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<sup>63</sup> As noted above, investigators lost visual surveillance of Mr. Shealey for approximately one hour on June 17, 2013. Therefore, investigators cannot verify whether the one Assist Report submitted by Mr. Shealey during this brief period reflected a legitimate assist.

<sup>64</sup> The OEIG concludes that an allegation is “founded” when it has determined that there is reasonable cause to believe that a violation of law or policy has occurred, or that there has been fraud, waste, mismanagement, misconduct, nonfeasance, misfeasance, or malfeasance.

Additionally, given that Mr. Shealey failed to perform his work duties for an extended period of time on June 17, 2013 while he was under surveillance, the allegation that Mr. Shealey committed the ETP rule infraction of using “work time for other than work purposes” by being off the expressway, not performing work duties for 3 hours and 24 minutes on June 17, 2013 is **FOUNDED**.

Lastly, given that Mr. Shealey failed to perform his work duties for an extended period of time on June 18, 2013 while he was under surveillance, the allegation that Mr. Shealey committed the ETP rule infraction of using “work time for other than work purposes” by being off the expressway, not performing work duties for 5 hours and 29 minutes on June 18, 2013 is **FOUNDED**.

## **2. ETP Driver Kevin McKeon**

The OEIG also reviewed numerous Assist Reports submitted by Mr. McKeon from February to April 2011, and May to September 2013. The 45 Assist Reports contained in *Attachments N-P*, as well as the 122 Assist Reports reviewed by investigators that followed a noticeable pattern of occurring at specific times, all submitted by Mr. McKeon during this combined eight-month period, were either entirely false, with a corresponding assist having never taken place at all, or contained information that did not accurately reflect an assist that did actually occur. As shown in the relevant charts, the license plates listed on Mr. McKeon’s Assist Reports either belonged to vehicle owners who denied receiving assistance, did not exist at the time of the reported assist, had no owner of record at the time of the assist, or were used on multiple occasions in a one or two-month period. In addition, as shown in *Attachments Q and R*, investigators determined that on the two days the OEIG conducted surveillance, Mr. McKeon submitted an additional 16 Assist Reports for assists that either never actually took place, or that inaccurately reflected an assist that did occur. Finally, Mr. McKeon admitted to investigators that he had been submitting false Assist Reports—that is, Assist Reports for assists that never occurred—and Assist Reports containing inaccurate information since at least 2010, and continued doing so until approximately a few months prior to his August 2015 OEIG interview.

Based on the foregoing, the allegation that Mr. McKeon submitted false Assist Reports for assists that never took place from 2010 to 2015 in violation of IDOT’s “Truth in Reporting” policy is **FOUNDED**. In addition, the allegation that Mr. McKeon submitted false Assist Reports for assists that never took place from 2010 to 2015 in violation of ETP’s rule against the intentional falsification of working records is **FOUNDED**. Furthermore, based on the foregoing evidence, the allegation that Mr. McKeon submitted Assist Reports reflecting actual assists that occurred but that contained inaccurate information, such as license plate, time of assist, location of assist, and more—on a regular basis from at least 2010 to 2015 in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

In addition, the OEIG conducted surveillance on Mr. McKeon for one full and one partial day in June 2013. Mr. McKeon submitted 16 total Assist Reports for assists allegedly performed during the periods of time he was under surveillance on these days; however, investigators observed Mr. McKeon perform only 4 assists during the two-day period surveilled, and even the

Assist Reports that correspond with those 4 assists do not accurately reflect the assists as they occurred, as shown in *Attachments Q* and *R*. Ultimately, instead of performing actual work, investigators observed Mr. McKeon parked off the expressway not performing work duties for 2 hours and 20 minutes on the full day he was under surveillance and for 37 minutes of the nearly hour and a half he was under surveillance the second day, passing vehicles on the side of the expressway without stopping to provide assistance, failing to respond to assignments from dispatch, and driving at high rates of speed along the expressway shoulders despite not being en route to an assist, among other things. Although Mr. McKeon told investigators that regenerating his ETP truck's emission control system sometimes requires him to sit idly for approximately 20 minutes periodically throughout the day on either an expressway shoulder or in an Accident Investigation Site, Mr. McKeon was not doing this when investigators observed him numerous times on the days of surveillance relaxing next to a pond and sitting under trees in the forest preserves.

Given that Mr. McKeon failed to perform his work duties for an extended period of time on June 20, 2013 while he was under surveillance, the allegation that Mr. McKeon committed the ETP rule infraction of using "work time for other than work purposes" by being off the expressway, not performing work duties for 2 hours and 20 minutes on June 20, 2013 is **FOUNDED**.

### **3. ETP Driver Andrew Casper**

Investigators also reviewed several hundreds of Assist Reports submitted by Mr. Casper from February to April 2011 and May to September 2013. The 508 Assist Reports contained in *Attachments S-U* and *Attachments V-Y*, each submitted by Mr. Casper during this combined eight-month period, were either entirely false, with a corresponding assist having never taken place at all, or contained information that did not accurately reflect an assist that did actually occur. As shown in the applicable charts, Mr. Casper submitted Assist Reports listing license plates belonging to vehicle owners who denied receiving assistance, had no owner of record at the time of the assist, were used on multiple occasions across several-month periods and in multiple years, or were similar to other license plates used repeatedly by Mr. Casper. Finally, Mr. Casper admitted during his interview that he had been submitting false Assist Reports—that is, Assist Reports for assists that never occurred—and Assist Reports containing inaccurate information since he began employment at ETP in 2007, and continued doing so up until the time of his interview in August 2015. Mr. Casper additionally admitted to creating and maintaining a "cheat sheet" of license plate numbers that he has regularly used over the years when completing falsified Assist Reports.

Mr. Casper stated that he does actually perform assists when he is on shift and only submits false Assist Reports to meet the quota set by ETP management. Nevertheless, Mr. Casper acknowledged that he was aware that creating and submitting false Assist Reports violated IDOT and ETP policies and still proceeded to do this throughout his employment.

Based on the foregoing, the allegation that Mr. Casper submitted false Assist Reports for assists that never took place from 2007 to 2015 in violation of IDOT's "Truth in Reporting" policy is **FOUNDED**. In addition, the allegation that Mr. Casper submitted false Assist Reports

for assists that never took place from 2007 to 2015 in violation of ETP's rule against the intentional falsification of working records is **FOUNDED**. Furthermore, based on the foregoing evidence, the allegation that Mr. Casper submitted inaccurate Assist Reports—that is, Assist Reports reflecting actual assists that occurred but containing inaccurate information, such as license plate, time of assist, location of assist, and more—on a regular basis from 2007 to 2015 in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

#### **4. ETP Driver Robert Matthews**

Investigators also reviewed more than one thousand Assist Reports submitted by Mr. Matthews between February and April 2011 and May and September 2013. The 204 Assist Reports contained in *Attachments Z-AA* and *Attachments BB-CC*, each submitted by Mr. Matthews during this eight-month period, were either entirely false, with a corresponding assist having never taken place at all, or contained information that did not accurately reflect an assist that did actually occur. As detailed in the above-indicated charts, the license plates listed on Mr. Matthews' Assist Reports either belonged to vehicle owners who denied receiving assistance, or were used on multiple occasions by Mr. Matthews over the course of several months, including numerous license plates that were allegedly involved in multiple accidents during these periods of time. Finally, Mr. Matthews admitted during his interview that he had been submitting Assist Reports for assists that never occurred, as well as Assist Reports containing inaccurate information, since he began employment at ETP in 2006, and continued doing so up until the time of his interview in July 2015. Although Mr. Matthews stated that he only falsified Assist Reports in order to meet the quota imposed by ETP management, he admitted that he knew that submitting false Assist Reports violated IDOT and ETP policies, and did so nonetheless.

Based on the foregoing, the allegation that Mr. Matthews submitted false Assist Reports for assists that never took place from 2006 to 2015 in violation of IDOT's “Truth in Reporting” policy is **FOUNDED**. In addition, the allegation that Mr. Matthews submitted false Assist Reports for assists that never took place from 2006 to 2015 in violation of ETP's rule against the intentional falsification of working records is **FOUNDED**. Finally, based on the foregoing evidence, the allegation that Mr. Matthews submitted inaccurate Assist Reports—that is, Assist Reports reflecting actual assists that occurred but containing inaccurate information, such as license plate, time of assist, location of assist, and more—on a regular basis from 2006 to 2015 in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

#### **5. ETP Driver David Alcantar**

During his OEIG interview, Mr. Alcantar admitted that he had been submitting Assist Reports for assists that never occurred since he began at ETP in 2006 and had continued to do so until a week before his OEIG interview. Although Mr. Alcantar stated that he submitted false Assist Reports only in order to meet the quota set forth by the ETP managers, he admitted that he knew submitting false Assist Reports was wrong. Mr. Alcantar also admitted that during his time with ETP, he has submitted Assist Reports for actual assists that have occurred but that nevertheless do not accurately reflect the assist as it occurred.

Based on the foregoing, the allegation that Mr. Alcantar submitted false Assist Reports for assists that never took place from 2006 to 2015 in violation of IDOT's "Truth in Reporting" policy is **FOUNDED**. In addition, the allegation that Mr. Alcantar submitted Assist Reports for assists that never took place from 2006 to 2015 in violation of ETP's rule against the intentional falsification of working records is **FOUNDED**. Finally, based on the foregoing evidence, the allegation that Mr. Alcantar submitted Assist Reports reflecting actual assists that occurred but that contained inaccurate information during his employment with ETP in violation of the IDOT "Truth in Reporting" policy is **FOUNDED**.

## **6. ETP Driver Dimitrius Coleman**

Mr. Coleman also admitted that he began submitting Assist Reports for assists that never occurred at the beginning of his employment with ETP in approximately 2004 or 2005, and continued to do so regularly throughout his employment until the months preceding his OEIG interview. As with several others, Mr. Coleman stated that he only submitted false Assist Reports to meet the quota set forth by the ETP managers, but admitted that he knew submitting false Assist Reports was nevertheless wrong. In addition, Mr. Coleman admitted to submitting Assist Reports for assists that did actually occur but that did not accurately reflect those assists, as well.

Based on the foregoing, the allegation that Mr. Coleman submitted false Assist Reports for assists that never took place from approximately 2004 or 2005 to 2015 in violation of IDOT's "Truth in Reporting" policy is **FOUNDED**. In addition, the allegation that Mr. Coleman submitted Assist Reports for assists that never took place from approximately 2004 or 2005 to 2015 in violation of ETP's rule against the intentional falsification of working records is **FOUNDED**. Finally, the allegation that Mr. Coleman submitted Assist Reports reflecting actual assists that occurred but that contained inaccurate information during his employment with ETP in violation of the IDOT "Truth in Reporting" policy is **FOUNDED**.

## **7. ETP Driver Sean Huber**

Mr. Huber admitted that during his time with ETP, he submitted Assist Reports for assists that never occurred. Although Mr. Huber could not say how long he had been falsifying Assist Reports, he did admit that it had been occurring "for some time," before he stopped the practice altogether within the year preceding his OEIG interview. Mr. Huber stated that while he submitted falsified Assist Reports only in order to meet the quota set forth by the ETP managers, he knew submitting false Assist Reports was wrong. Mr. Huber also stated that he has submitted Assist Reports for assists that did occur but that contained false or inaccurate information during his time as an ETP driver.

Based on the foregoing, the allegation that Mr. Huber submitted false Assist Reports for assists that never took place during his employment at ETP, including within the year preceding his September 2015 interview, in violation of IDOT's "Truth in Reporting" policy is **FOUNDED**. In addition, the allegation that Mr. Huber submitted Assist Reports for assists that never took place during his employment at ETP, including within the year preceding his September 2015 interview, in violation of ETP's rule against the intentional falsification of

working records is **FOUNDED**. Finally, the allegation that Mr. Huber submitted Assist Reports reflecting actual assists that occurred but that contained inaccurate information during his employment with ETP in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

#### **8. ETP Driver Jerome Lockhart**

Mr. Lockhart also admitted to submitting Assist Reports for assists that never occurred during his employment with ETP. Although Mr. Lockhart could not recall specifically when he began submitting falsified Assist Reports, he knew it had been going on for “a couple years,” and continued until a few months preceding his OEIG interview. As with several others, Mr. Lockhart stated that he submitted false Assist Reports in order to meet the quota set forth by the ETP managers. Nevertheless, Mr. Lockhart admitted that he knew submitting false Assist Reports was wrong but continued to do so nonetheless.

Based on the foregoing, the allegation that Mr. Lockhart submitted false Assist Reports for assists that never took place during his employment at ETP, including in 2015, in violation of IDOT’s “Truth in Reporting” policy is **FOUNDED**. In addition, the allegation that Mr. Lockhart submitted Assist Reports for assists that never took place during his employment at ETP, including in 2015, in violation of ETP’s rule against the intentional falsification of working records is **FOUNDED**.

#### **9. ETP Driver Francois Mendez**

Mr. Mendez admitted that he had been submitting Assist Reports for assists that never occurred since he began working at ETP in 2008, and had continued to do so throughout his seven years as an ETP driver. Although Mr. Mendez stated that he only submitted false Assist Reports to meet the quota set forth by the ETP managers, he nevertheless admitted that he knew submitting false Assist Reports was wrong. In addition, Mr. Mendez admitted to submitting Assist Reports that did not accurately reflect assists that actually occurred during his employment with ETP, as well.

Based on the foregoing, the allegation that Mr. Mendez submitted false Assist Reports for assists that never took place from 2008 to 2015 in violation of IDOT’s “Truth in Reporting” policy is **FOUNDED**. In addition, the allegation that Mr. Mendez submitted false Assist Reports for assists that never took place from 2008 to 2015 in violation of ETP’s rule against the intentional falsification of working records is **FOUNDED**. Finally, based on the foregoing evidence, the allegation that Mr. Mendez submitted Assist Reports reflecting actual assists that occurred but that contained inaccurate information during his employment with ETP in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

#### **10. ETP Driver Michael Piwcewicz**

Finally, Mr. Piwcewicz admitted to investigators that from the time he began as an ETP driver in 2002 until approximately May 2015, he most likely submitted Assist Reports containing inaccurate information on a daily basis. However, Mr. Piwcewicz denied having ever submitted an Assist Report for an assist that never occurred. Based on the foregoing, the allegation that

Mr. Piwcewicz submitted Assist Reports reflecting actual assists that occurred but containing inaccurate information on a regular basis from 2002 until approximately May 2015 in violation of the IDOT “Truth in Reporting” policy is **FOUNDED**.

### **C. The Lack of Oversight By Managers At ETP**

Because of the prevalent, deep-rooted practice of ETP drivers submitting Assist Reports for assists that did not occur and Assist Reports that inaccurately detailed actual assists, the OEIG looked into the management of the ETP unit. First, the OEIG discovered that having a requirement that drivers perform a certain number of assists per day while not having any checks in place to ensure the truthfulness and accuracy of the drivers’ Assist Reports allowed, and ultimately encouraged, the submission of false Assist Reports and the inflation of assist numbers to satisfy management’s requirements. Second, the OEIG found that ETP managers either knew of or suspected the reporting of false assists by drivers but did nothing about it, or chose to purposefully insulate themselves from the knowledge of this systematic problem.

#### **1. ETP’s Daily Assist Requirement Encourages the Falsification of Assists**

As confirmed by administrators, supervisors, and drivers alike, the ETP unit has a set number of assists that the drivers are expected to perform each shift. Although almost every individual interviewed advised that this is an “informal” quota, everyone agreed that the drivers are consistently told that they have to conduct a certain number of assists, and are subject to poor treatment and other negative consequences if they do not, including being stared down by a supervisor, being told they are not team players, getting their “ear chewed off,” and being written up. However, several ETP drivers and even some supervisors admitted that there are days when there is not much assistance needed on the roads. Therefore, requiring a certain number of assists per shift and fostering an atmosphere where drivers who do not bring in the minimum number of assists are looked down upon or disciplined has created a culture where the drivers feel the need to make up assists and falsify Assist Reports. Although IDOT District One Bureau Chief Stephen Travia stated that the reason ETP has an “informal” quota rather than a “formal” quota is because having a “formal” quota would give the drivers an incentive to “make stuff up,” it is readily apparent that having any type of quota without any checks on work performance has had the same effect.

#### **2. ETP’s Failure to Check Driver Activity Perpetuates the Falsification of Assist Reports**

Although ETP management requires drivers to perform a certain amount of assists each day, no one at ETP is checking to ensure those assists are actually occurring or that the Assist Reports submitted by drivers are legitimate and truthful. As a result, ETP drivers are able to submit Assist Reports for assists that never occurred without anyone noticing or being able to prove otherwise.

The ETP unit is structured so that three supervisors are responsible for monitoring at least 15 different drivers who are patrolling 13 different areas along approximately 950 lane miles of

expressway. Given the vast area each supervisor is responsible for overseeing, the fact that the drivers are supposed to be continuously patrolling the expressways, and the fact that the supervisors are often needed to back-up ETP drivers during assists or provide assistance to motorists themselves, it is impossible for the supervisors to actually know where each driver is and what they are doing at all times. While each ETP supervisor does have access to the radio frequency used by the drivers to communicate with the IDOT Communications Center, Lead Lead Worker Zenon McHugh told investigators that he does not expect the supervisors to keep track of the calls a driver receives, the assists a driver performs, or the breaks a driver takes. In addition, ETP Patrol Manager John Gonzalez told investigators that he has never told the ETP supervisors to make sure their drivers are actually out on the roads patrolling. Therefore, while it is possible for a supervisor to monitor their drivers to some extent using the radio and possible for a supervisor to monitor the drivers while on the road to some extent, they are simply not expected or told to do so. As a result, the ETP drivers are unsupervised for most, if not all, of their shift.

In addition to not being monitored in any meaningful way while out on the roads, the ETP drivers' daily Assist Reports are never reviewed by anyone for legitimacy or truthfulness. Although ETP Patrol Manager John Gonzalez told investigators that the accuracy of Assist Reports is important, the three front-line ETP supervisors interviewed—Lead Lead Worker Zenon McHugh, Lead Worker Robin Thorpe, and Lead Worker Joseph Huante—consistently stated otherwise. Each of these individuals informed investigators that no one is concerned about the accuracy of Assist Reports, and said that Assist Reports are never reviewed except to ensure they are completely filled out. In addition, investigators were informed that it is the responsibility of the oncoming shift supervisor to collect the Assist Reports submitted by the off-going shift. Therefore, although Assist Reports are not reviewed when they are submitted, even if they were, the reviewing supervisor would have no way to verify whether the assists reported actually occurred because the reviewing supervisor did not work that shift.

The combination of the use of quotas, drivers being largely unsupervised during their shift, and the lack of review of Assist Reports, has allowed and perpetuated the falsification of Assist Reports. ETP drivers know that no one is checking to make sure they are actually patrolling the expressways and performing assists, and also know that no one checks the Assist Reports they turn in to make sure they reflect assists that were actually performed. Because of this, for years drivers have been making them up in order to meet the minimum number of assists required each day by ETP management.

### **3. Supervisor Knowledge of False Assist Reports**

Finally, and perhaps most significantly, each of the Lead Lead and Lead Workers interviewed stated that they either knew drivers were falsifying Assist Reports or had heard it was occurring, yet did absolutely nothing to prevent or stop it. Ultimately, the inaction by these individuals allowed the ETP drivers to continue perpetrating fraud without any repercussions.

#### **a) Joseph Huante**

Lead Worker Joseph Huante admitted to investigators that he personally submitted false Assist Reports when he was an ETP driver, and is aware that other ETP drivers had also submitted false Assist Reports in the past. Mr. Huante stated that while he does not know for sure, he believes ETP drivers still submit false Assist Reports in order to meet the minimum number of assists required by ETP management. Despite his personal experience and knowledge of the falsification of Assist Reports, as well as his suspicions that the practice was still continuing, Mr. Huante has done nothing to stop drivers from submitting false Assist Reports. Mr. Huante has never told his drivers to not make up Assist Reports or even just to be accurate on the Assist Reports they submit, and has never told any of his own supervisors or members of the ETP management that drivers might be submitting Assist Reports for assists that did not occur. Although Mr. Huante reasoned that he has taken no action because he is afraid doing so will lead ETP management to think he is only causing problems, his intentional inaction and concealment of fraud undoubtedly amounts to mismanagement and misconduct, in the very least. Given the foregoing, it is clear Mr. Huante did not perform his work duties to the best of his abilities, and therefore, the allegation that ETP Lead Worker Joseph Huante violated the “Work Performance” provision of the IDOT Personnel Policies Manual is **FOUNDED**. Additionally, it is clear that Mr. Huante did not exercise proper supervision over his subordinates, and did not take any corrective action or address or report the misconduct of his subordinates in any way. Therefore, the allegation that Mr. Huante violated the provision in the IDOT Personnel Policies Manual regarding supervisor responsibilities is also **FOUNDED**.

**b) Robin Thorpe**

Lead Worker Robin Thorpe also admitted to investigators that he is aware ETP drivers might have submitted false Assist Reports in the past, and has suspicions that drivers are still doing so now. Nevertheless, Mr. Thorpe has done nothing to look further into the issue or make any attempts to prevent or stop the falsification of Assist Reports, including notifying any of his own superiors about the possibility fraud is occurring. Although Mr. Thorpe stated that there is little he can do about his suspicions because he cannot actually prove drivers are making up assists and submitting false Assist Reports, Mr. Thorpe then admitted that simply looking at the Assist Reports submitted by the ETP drivers could reveal suspicious patterns or other discrepancies suggestive of fraud. Ultimately, as with Mr. Huante, Mr. Thorpe’s purposeful inaction with relation to his suspicions and his willful ignorance as to the presence of actual fraud amounts to mismanagement and misconduct. Given that Mr. Thorpe did not perform his work duties to the best of his abilities, and therefore, the allegation that ETP Lead Worker Robin Thorpe violated the “Work Performance” provision of the IDOT Personnel Policies Manual is **FOUNDED**. Additionally, given that Mr. Thorpe clearly did not exercise proper supervision over his subordinates, and did not take any corrective action or address or report the misconduct of his subordinates in any way, the allegation that he violated the provision in the IDOT Personnel Policies Manual regarding supervisor responsibilities is also **FOUNDED**.

**c) Zenon McHugh**

Lead Lead Worker Zenon McHugh admitted to investigators that he has heard “shop talk” among ETP drivers about the falsification of Assist Reports, but said he nevertheless has never inquired into the comments he has heard because it is not his job to check them and he

does not care about assist sheets. Mr. McHugh additionally informed investigators that he has never instructed his ETP drivers to refrain from submitting false Assist Reports. Although Mr. McHugh admitted that it has occurred to him that drivers might feel pressure to keep their assist numbers up due to a quota imposed by ETP management, telling drivers to not falsify Assist Reports is “above [his] paygrade.” In addition, Mr. McHugh stated that he does nothing to ensure his drivers are actually on the roads working and assisting motorists or that his subordinate supervisors are making sure the ETP drivers are actually working. Ultimately, Mr. McHugh made clear that he does not care about the truthfulness or accuracy of Assist Reports or that work is actually being performed by ETP drivers, and as a result, has turned a blind eye to the fraudulent activity even when he has overheard conversations suggesting it is occurring. While Mr. McHugh may not have thought it was his job to check Assist Reports and ensure they are truthful, he is the Lead Lead Worker responsible for at least one ETP shift and dozens of drivers, and as such, has a responsibility to ensure his drivers are performing their work duties and following all IDOT and ETP policies and rules. It is clear that Mr. McHugh did not exercise proper supervision over his subordinates, and did not take any corrective action or address or report the misconduct of his subordinates in any way. Therefore, the allegation that Mr. McHugh violated the provision in the IDOT Personnel Policies Manual regarding supervisor responsibilities is **FOUNDED**. Ultimately, Mr. McHugh’s intentional ignorance of potential fraud and his resulting inaction undoubtedly amounts to mismanagement and misconduct on its own. Although Mr. McHugh told investigators, “If no one is looking, it’s not a problem,” the OEIG disagrees and as a result, the allegation that Mr. McHugh himself violated the IDOT policy on “Work Performance” is also **FOUNDED**.

**d) John Gonzalez**

Finally, ETP Patrol Manager John Gonzalez stated that he is not aware of drivers submitting falsified Assist Reports but admitted that it is possible ETP drivers are making up assists and submitting false Assist Reports. Mr. Gonzalez acknowledged that he does not require the Lead Lead or Lead Workers to do anything to make sure the drivers are actually on the expressways patrolling and performing assists, and does not require the supervisors to review the Assist Reports drivers submit. Despite this lack of concern for the honest productivity of the ETP unit, Mr. Gonzalez has nevertheless continuously enforced the daily assist quota since he began at ETP. Supervisors and Mr. Gonzalez, admitted that Mr. Gonzalez regularly tells the ETP supervisors to inform their drivers that they have to meet the set quota which can be anywhere from 8 to 12 assists per shift. Furthermore, Mr. Gonzalez provides supervisors with a monthly list of drivers who do not meet this minimum and requires the supervisors to talk to the drivers in order to get their numbers up. Drivers, including Mr. Alcantar, Mr. Huber, Mr. Mendez, and Mr. Lockhart, stated that they have either seen supervisors talk negatively to or treat poorly drivers who have come in with fewer assists than the set quota, including being stared down by supervisors, being told they are not team players, getting their “ear chewed off,” and being written up.

Mr. Gonzalez’s constant push for a high number of assists and a failure to put any checks in place to detect or discourage fraud has created an atmosphere in which drivers not only feel compelled to falsify Assist Reports in order to meet the minimum number required by management, but also in which they are able to knowingly get away with it. As the individual in

charge of the ETP unit, Mr. Gonzalez is responsible for the unit; therefore, Mr. Gonzalez is responsible for failing to take adequate steps to ensure the ETP drivers and supervisors are performing their work duties to the best of their abilities and are being honest and accurate in the work they do perform. Given Mr. Gonzalez's clear mismanagement of the ETP unit and the rampant misconduct committed by numerous ETP drivers and supervisors under his watch and control, it is clear that Mr. Gonzalez has not performed his own work duties to the best of his abilities, and has also failed to exercise proper supervision over his subordinates, take corrective action, or even address the misconduct of his subordinates. Therefore, the allegation that Mr. Gonzalez violated the IDOT Personnel Policies Manual provision regarding "Work Performance" is **FOUNDED**, and the allegation that Mr. Gonzalez violated the IDOT Personnel Policies Manual provision regarding supervisor responsibilities is also **FOUNDED**.

#### **D. Conclusion**

Over the past several years, numerous IDOT ETP drivers have been making up assists and submitting falsified Assist Reports to make it appear as if they are doing more work than they actually are. Pressured to perform a certain number of assists per day but often unable to meet this goal on their own, the drivers have been able to perpetrate fraud due to a complete lack of supervision on the roads and a failure of the ETP supervisors and administrators to have simple and easily implemented checks and balances in place to ensure the honesty and integrity of the work reportedly performed and the documents submitted by the ETP drivers. Based on all of the evidence uncovered throughout the OEIG investigation, the ETP unit is significantly mismanaged and has resulted in serious fraud occurring over many years.

### **VI. CONCLUSION**

As a result of its investigation, the OEIG concludes that there is **REASONABLE CAUSE TO ISSUE THE FOLLOWING FINDINGS**:

- **FOUNDED** – John Shealey violated the IDOT "Truth in Reporting" policy from 2002 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – John Shealey violated ETP's rule against the intentional falsification of working records from 2002 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – John Shealey violated the IDOT "Truth in Reporting" policy from 2002 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – John Shealey violated the ETP rule against using "work time for other than work purposes" on June 11, 2013 by spending 2 hours and 58 minutes off the expressway, not performing work duties.
- **FOUNDED** – John Shealey violated the ETP rule against using "work time for other than work purposes" on June 17, 2013 by spending 3 hours and 24 minutes off the expressway, not performing work duties.

- **FOUNDED** – John Shealey violated the ETP rule against using “work time for other than work purposes” on June 18, 2013 by spending 5 hours and 29 minutes off the expressway, not performing work duties.
- **FOUNDED** – Kevin McKeon violated the IDOT “Truth in Reporting” policy from 2010 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Kevin McKeon violated ETP’s rule against the intentional falsification of working records from 2010 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Kevin McKeon violated the IDOT “Truth in Reporting” policy from 2010 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Kevin McKeon violated the ETP rule against using “work time for other than work purposes” on June 20, 2013 by spending 2 hours and 20 minutes off the expressway, not performing work duties.
- **FOUNDED** – Andrew Casper violated the IDOT “Truth in Reporting” policy from 2007 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Andrew Casper violated ETP’s rule against the intentional falsification of working records from 2007 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Andrew Casper violated the IDOT “Truth in Reporting” policy from 2007 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Robert Matthews violated the IDOT “Truth in Reporting” policy from 2006 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Robert Matthews violated ETP’s rule against the intentional falsification of working records from 2006 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Robert Matthews violated the IDOT “Truth in Reporting” policy from 2006 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – David Alcantar violated the IDOT “Truth in Reporting” policy from 2006 to 2015 by submitting Assist Reports for assists that never occurred.

- **FOUNDED** – David Alcantar violated ETP’s rule against the intentional falsification of working records from 2006 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – David Alcantar violated the IDOT “Truth in Reporting” policy from 2006 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Dimitrius Coleman violated the IDOT “Truth in Reporting” policy from at least 2005 until 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Dimitrius Coleman violated ETP’s rule against the intentional falsification of working records from at least 2005 until 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Dimitrius Coleman violated the IDOT “Truth in Reporting” policy from at least 2005 until 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Sean Huber violated the IDOT “Truth in Reporting” policy for several years during his employment with ETP, including until at least 2014, by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Sean Huber violated ETP’s rule against the intentional falsification of working records for several years during his employment with ETP, including until at least 2014, by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Sean Huber violated the IDOT “Truth in Reporting” policy for several years during his employment with ETP, including until at least 2014, by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Jerome Lockhart violated the IDOT “Truth in Reporting” policy for several years during his employment with ETP, including until at least April 2015, by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Jerome Lockhart violated ETP’s rule against the intentional falsification of working records for several years during his employment with ETP, including until at least April 2015, by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Francois Mendez violated the IDOT “Truth in Reporting” policy from 2008 to 2015 by submitting Assist Reports for assists that never occurred.

- **FOUNDED** – Francois Mendez violated ETP’s rule against the intentional falsification of working records from 2008 to 2015 by submitting Assist Reports for assists that never occurred.
- **FOUNDED** – Francois Mendez violated the IDOT “Truth in Reporting” policy from 2008 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Michael Piwcewicz violated the IDOT “Truth in Reporting” policy from 2002 to 2015 by submitting Assist Reports containing inaccurate information.
- **FOUNDED** – Joseph Huante violated the IDOT “Work Performance” policy by failing to perform his supervisory work duties to the best of his ability.
- **FOUNDED** – Joseph Huante violated the IDOT policy regarding supervisory responsibilities by failing to adequately supervise and manage ETP drivers, and prevent the commission of serious fraud over the course of several years.
- **FOUNDED** – Robin Thorpe violated the IDOT “Work Performance” policy by failing to perform his supervisory work duties to the best of his ability.
- **FOUNDED** – Robin Thorpe violated the IDOT policy regarding supervisory responsibilities by failing to adequately supervise and manage ETP drivers, and prevent the commission of serious fraud over the course of several years.
- **FOUNDED** – Zenon McHugh violated the IDOT “Work Performance” policy by failing to perform his supervisory work duties to the best of his ability.
- **FOUNDED** – Zenon McHugh violated the IDOT policy regarding supervisory responsibilities by failing to adequately supervise and manage ETP drivers, and prevent the commission of serious fraud over the course of several years.
- **FOUNDED** – John Gonzalez violated the IDOT “Work Performance” policy by failing to perform his supervisory work duties to the best of his ability.
- **FOUNDED** – John Gonzalez violated the IDOT policy regarding supervisory responsibilities by failing to adequately supervise and manage ETP drivers, and prevent the commission of serious fraud over the course of several years.

With respect to Mr. Shealey and Mr. McKeon, the OEIG recommends that these individuals be terminated from State employment. In addition to Mr. Shealey and Mr. McKeon both admitting to knowingly falsifying numerous Assist Reports throughout their employment with ETP, Mr. Shealey and Mr. McKeon were both observed by OEIG investigators on more than one date parked off the expressway not working for extended periods of time during their regular working hours. Furthermore, investigators discovered that during these periods of time,

Mr. Shealey and Mr. McKeon both submitted several Assist Reports claiming to have assisted vehicles, although they actually did not. So while Mr. Shealey and Mr. McKeon submitted numerous falsified Assist Reports like several other ETP drivers addressed below, Mr. Shealey and Mr. McKeon's misconduct went beyond: while others were, in fact, performing assists and patrolling the expressways, Mr. Shealey and Mr. McKeon were not. Given the extent of their misconduct, the OEIG recommends Mr. Shealey and Mr. McKeon be terminated from State employment, and a copy of this report be placed in their respective personnel files.

With respect to Mr. Casper, Mr. Matthews, Mr. Alcantar, Mr. Coleman, Mr. Huber, Mr. Lockhart, Mr. Mendez, and Mr. Piwcewicz, the OEIG recommends that they be disciplined as IDOT deems necessary and appropriate to ensure their understanding of the gravity of their misconduct and prevent similar misconduct in the future. While the OEIG appreciates the honesty and cooperation of these drivers in their interviews, the regular falsification of Assist Reports and its consequences is serious and significant enough to warrant disciplinary action. While these drivers' reasons for falsifying Assist Reports varied slightly, the overwhelming majority indicated that they made up assists in order to meet the minimum number required each shift. Their conduct violated IDOT and ETP policy and is a symptom of the mismanaged ETP unit.

The OEIG investigated only a portion of the IDOT District One ETP employees. Because of the widespread and systemic problems uncovered, the wrongdoing most likely extends to many other District One ETP drivers and supervisors. Accordingly, the OEIG recommends that IDOT continue to determine whether other drivers engaged in this misconduct, and at the very least, counsel *all* ETP drivers regarding the falsification of work documents, including but not limited to Assist Reports. The OEIG also recommends that this further investigation and counseling by IDOT include the District Eight ETP unit to ensure this misconduct is not occurring there as well.

With respect to Mr. McHugh, Mr. Thorpe, and Mr. Huante, the OEIG recommends termination from State employment. It is apparent that these individuals have intentionally buried their heads in the sand with respect to their knowledge of the falsification of driver Assist Reports instead of taking any steps to prevent or stop the misconduct. The OEIG additionally recommends the termination of Mr. Gonzalez's employment, as the evidence suggests he is not equipped to manage the ETP unit adequately. In short, a unit that is responsible for providing emergency assistance to the motoring public throughout the Chicagoland area needs managers who are trying to ensure that the unit is operating with honesty and integrity rather than allowing and perpetuating continued fraudulent activity. Accordingly, the OEIG recommends the termination of these four managers.

Although, at this time, there is insufficient evidence to make a finding that the higher-level ETP administrators above Mr. Gonzalez knew or should have known this practice was occurring, these higher-level managers are ultimately responsible for the operation of the ETP unit. Thus, the OEIG recommends that IDOT take whatever action it deems necessary to ensure the effective management of the ETP unit in the future.

Lastly, the OEIG further recommends that IDOT implement controls to prevent, or at least, discourage fraudulent reporting by ETP drivers. For example, each ETP vehicle is already equipped with an AVL system that tracks the location of each vehicle in real-time throughout the day. If ETP managers or supervisors had access to this system, they could monitor the movement of their drivers and ensure the drivers are actually on the expressways, patrolling and performing assists. Additionally, ETP management could also require supervisors to conduct a simple and quick review of the Assist Reports submitted by the drivers they supervise. Or, if *any* supervisor even reviewed Assist Reports, things such as repeated license plates, similar license plates, and other noticeable patterns in the information reported could raise suspicions and warrant further inquiry. Finally, because IDOT scans each Assist Report into an agency computer database, it is possible that the information extracted could be used in some way to identify inaccurate or suspicious information. Although the OEIG has noted several potential ways to prevent and detect fraudulent reporting by ETP drivers, the OEIG defers to IDOT to decide what controls are appropriate to implement.

No further investigative action is needed and this case is considered closed.

Date: January 19, 2016

**Office of Executive Inspector General for  
the Agencies of the Illinois Governor**  
69 W. Washington Street, Ste. 3400  
Chicago, IL 60602

**Colleen Thomas**  
Assistant Inspector General

**Francis Foley**  
Investigator # 156

**Attachment A**  
**RELEVANT ETP SALARIES FOR 2014, except as noted<sup>1</sup>**

<b>OPERATIONS MANAGER</b>	
Michael Schivarelli	\$109,900
<b>ETP PATROL MANAGER</b>	
John Gonzalez	\$84,185
<b>ETP EQUIPMENT MANAGER</b>	
James McKay	\$87,241
<b>LEAD LEAD WORKER</b>	
Zenon McHugh	\$106,991
<b>LEAD WORKERS</b>	
Robin Thorpe	\$106,156
Joseph Huante	\$103,953
<b>DRIVERS</b>	
John Shealey	\$39,127 <sup>2</sup>
Andrew Casper	\$87,841
Kevin McKeon	\$86,529
Robert Matthews	\$103,319
David Alcantar	\$114,791
Francois Mendez	\$106,840
Michael Piwcewicz	\$122,247
Dimitrius Coleman	\$12,325 <sup>3</sup>
Sean Huber	\$87,482
Jerome Lockhart	\$98,889

<sup>1</sup> All salary data was obtained from the Illinois Transparency and Accountability Portal website.

<sup>2</sup> Mr. Shealey was on a leave of absence during part of 2014 and therefore, did not receive a full year's salary.

<sup>3</sup> Mr. Coleman was also on a leave of absence during part of 2014 and therefore, did not receive a full year's salary.

Sample Assist Report

# ILLINOIS DIVISION OF HIGHWAYS EMERGENCY TRAFFIC PATROL ASSIST REPORT

MONTH	DATE	DAY	ARRIVAL TIME		DEPARTURE TIME		PATROLMAN NUMBER	POLICE
			HOUR	MINUTE	HOUR	MINUTE		
FEB <input type="checkbox"/>	0 0	SUN <input type="checkbox"/>	0 0	0 0	0 0	0 0	0 0 0	PRESENT <input type="checkbox"/>
MAR <input type="checkbox"/>	1 1	MON <input type="checkbox"/>	1 1	1 1	1 1	1 1	1 1 1	NOT PRESENT <input type="checkbox"/>
APR <input type="checkbox"/>	2 2	TUE <input type="checkbox"/>	2 2	2 2	2 2	2 2	2 2 2	
MAY <input type="checkbox"/>	3 3	WED <input type="checkbox"/>	3 3	3 3	3 3	3 3	3 3 3	
JUN <input type="checkbox"/>	4 4	THUR <input type="checkbox"/>	4 4	4 4	4 4	4 4	4 4 4	
JUL <input type="checkbox"/>	5 5	FRI <input type="checkbox"/>	5 5	5 5	5 5	5 5	5 5 5	SQUAD # <div style="border: 1px solid black; width: 50px; height: 20px; display: inline-block;"></div>
AUG <input type="checkbox"/>	6 6	SAT <input type="checkbox"/>	6 6	6 6	6 6	6 6	6 6 6	
SEP <input type="checkbox"/>	7 7		7 7	7 7	7 7	7 7	7 7 7	
OCT <input type="checkbox"/>	8 8		8 8	8 8	8 8	8 8	8 8 8	
NOV <input type="checkbox"/>	9 9		9 9	9 9	9 9	9 9	9 9 9	
DEC <input type="checkbox"/>								

CAUSE	MARK ONLY IF DISABLED	VEHICLE TYPE	ACTIONS	1st	2nd	3rd
ACCIDENT W/O STATE P.D. <input type="checkbox"/>			ASSIST OTHER E.P.V. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ACCIDENT WITH STATE P.D. <input type="checkbox"/>			PROTECT <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# <div style="border: 1px solid black; width: 100px; height: 20px; display: inline-block;"></div>			CLEAR DEBRIS <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FIRE <input type="checkbox"/>			FIRST AID <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NON DISABILITY <input type="checkbox"/>			TRANSPORT MOTORIST OR PEDESTRIAN <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ABANDONED <input type="checkbox"/>			MOVE TO SHOULDER <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PEDESTRIAN <input type="checkbox"/>			REPAIR DISABILITY <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DEBRIS (NON-ACCIDENT) <input type="checkbox"/>			ISSUE EMERGENCY FUEL <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*DISABILITY <input type="checkbox"/>			RELOCATE VEHICLE AND NOTIFY DISPATCHER <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTHER <input type="checkbox"/>			OTHER <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MILE MARKER NUMBER	EXPRESSWAY + DIRECTION	LATERAL LOCATION	TRAFFIC IMPACT	
0 0 0 0 0	OTHER <input type="checkbox"/>	LEFT SHOULDER <input type="checkbox"/>	ANY TRUCK INVOLVED	MAXIMUM LANES BLOCKED
1 1 1 1 1	FORD NB <input type="checkbox"/> SB <input type="checkbox"/>	EXPRESS OR REV. <input type="checkbox"/>	YES <input type="checkbox"/>	ZERO <input type="checkbox"/>
2 2 2 2 2	EDENS NB <input type="checkbox"/> SB <input type="checkbox"/>	LANE 1 <input type="checkbox"/>		ONE <input type="checkbox"/>
3 3 3 3 3	EISENHOWER EB <input type="checkbox"/> WB <input type="checkbox"/>	LANE 2 <input type="checkbox"/>		TWO <input type="checkbox"/>
4 4 4 4 4	KENNEDY NWB <input type="checkbox"/> SEB <input type="checkbox"/>	LOCAL OR REG. <input type="checkbox"/>	NO <input type="checkbox"/>	THREE OR MORE <input type="checkbox"/>
5 5 5 5 5	DAN RYAN NB <input type="checkbox"/> SB <input type="checkbox"/>	LANE 3 <input type="checkbox"/>		EXIT RAMP <input type="checkbox"/>
6 6 6 6 6	STEVENSON NEB <input type="checkbox"/> SWB <input type="checkbox"/>	LANE 4 <input type="checkbox"/>		ENTRANCE RAMP <input type="checkbox"/>
7 7 7 7 7	I-80 EB <input type="checkbox"/> WB <input type="checkbox"/>	OTHER <input type="checkbox"/>		
8 8 8 8 8	I-57 NB <input type="checkbox"/> SB <input type="checkbox"/>	RIGHT SHOULDER <input type="checkbox"/>		
9 9 9 9 9	FRANKLIN ST CONNECTOR NB <input type="checkbox"/> SB <input type="checkbox"/>	ENT RAMP <input type="checkbox"/>		
	KINGERY EB <input type="checkbox"/> WB <input type="checkbox"/>	EXIT RAMP <input type="checkbox"/>		
	OHIO-ONTARIO EB <input type="checkbox"/> WB <input type="checkbox"/>	ACCEL LANE <input type="checkbox"/>		
		DECEL LANE <input type="checkbox"/>		

LICENSE PLATE INFORMATION				CROSS STREET <div style="border: 1px solid black; width: 200px; height: 20px; display: inline-block;"></div>
LICENSE NUMBER: <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div>	YEAR <div style="border: 1px solid black; width: 50px; height: 20px; display: inline-block;"></div>	STATE <div style="border: 1px solid black; width: 50px; height: 20px; display: inline-block;"></div>	USE BLACK PENCIL MAKE MARKS DARK ERASE ERRORS COMPLETELY	
RADIO NUMBER <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div>				

**Automobile Information:****Attachment B****State Police on Scene:**

Make: \_\_\_\_\_ Year: \_\_\_\_\_

Trooper # \_\_\_\_\_

Color: \_\_\_\_\_ Plate: \_\_\_\_\_

Report # \_\_\_\_\_

Relocated To: \_\_\_\_\_

Advised Control: ☐ Yes Prior Damage Noted: \_\_\_\_\_

Injured Persons: \_\_\_\_\_

Name: \_\_\_\_\_

No. of Injured: \_\_\_\_\_

Address: \_\_\_\_\_

Hospital: \_\_\_\_\_

City: \_\_\_\_\_ Phone: \_\_\_\_\_

**Tractor/Trailer Information**Fatality: ☐ Yes Driver ☐Passenger ☐Pedestrian ☐

Tractor Plate: \_\_\_\_\_

Other: \_\_\_\_\_

Trailer Plate: \_\_\_\_\_

Relocated To: \_\_\_\_\_

Advised Control: ☐ Yes Prior Damage Noted: \_\_\_\_\_**Truck Carrying:**

Driver Name: \_\_\_\_\_

Address: \_\_\_\_\_

Weight of Load: \_\_\_\_\_

City: \_\_\_\_\_ Phone: \_\_\_\_\_

Other: \_\_\_\_\_

Owner Name: \_\_\_\_\_

Owner Address: \_\_\_\_\_

City: \_\_\_\_\_ Phone: \_\_\_\_\_

**State Property Damage:****Emergency Patrol Units**

\_\_\_\_\_ Sec. Guardrail

\_\_\_\_\_ Large Sign Truss Damage

\_\_\_\_\_ Crash Barrels

\_\_\_\_\_ Guardrail Posts

\_\_\_\_\_ Light Pole

\_\_\_\_\_ Barricades

\_\_\_\_\_ Ft. Handrail

\_\_\_\_\_ Ft. Barrier Wall

\_\_\_\_\_ Exit Sign (Small Green)

\_\_\_\_\_ Trees/Sod

Gate Damage: \_\_\_\_\_

Sign Reads: \_\_\_\_\_

Pavement Damage: \_\_\_\_\_

Length/Time Of Lane Blockage: \_\_\_\_\_

Other: \_\_\_\_\_

Additional Notes: \_\_\_\_\_

Printed By The Agency of The State of Rhode  
12-21-04 6P 2103

**Attachment C**  
**Shealey's 2011 Assist Reports For Which Owner Denied Receiving Assistance**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Owner Interview</i></u>	<u><i>Date of Assist</i></u>
1	[REDACTED]	Owner stated no contact	4/25/11
2		Owner stated no contact on date of assist	2/23/11
3		Owner stated no contact <sup>4</sup>	2/3/11
4		Owner had IDOT contact in the past, but not on date of assist	4/28/11
5	[REDACTED]	Owner stated no contact and vehicle repossessed in December 2010	2/12/11
6			2/14/11
7			2/16/11
8			2/17/11 <sup>5</sup>
9			2/27/11
10			3/12/11
11			3/18/11
12			3/25/11
13			4/2/11
14			4/21/11
15			4/28/11
16			4/29/11
17	[REDACTED]	Owner had no knowledge of any IDOT assist	4/30/11
18		Owner stated no contact	4/30/11
19		Owner stated no contact	2/27/11
20		Owner stated no contact <sup>6</sup>	3/8/11
21		Owner had IDOT contact in the past, but not on dates of assist	3/7/11
22		Owner stated no contact	3/7/11

<sup>4</sup> Owner stated she has not owned the vehicle since it was in a significant accident in 2003. The license plates were removed from the vehicle at that time and never put on another car.

<sup>5</sup> This Assist Report is marked as 2/17/11 and 2/27/11.

<sup>6</sup> The owner's nephew was also interviewed and denied receiving any assistance from IDOT. Both the owner and her nephew stated that they believed they had donated the vehicle to charity prior to the date of the alleged assist, and did not use the plates after that time.

**Attachment D**  
**Shealey's 2011 Assists Listing License Plates That Had Never Been Issued**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
23	3211032	License plate destroyed prior to delivery to SOS facility.	4/14/11
24	3211078	License plate destroyed prior to delivery to SOS facility.	4/4/11
25 26	3211450	License plate destroyed prior to delivery to SOS facility.	2/27/11 3/13/11
27	3211492	License plate destroyed prior to delivery to SOS facility.	2/7/11
28	3211608	License plate destroyed prior to delivery to SOS facility.	2/2/11
29	3211682	License plate destroyed prior to delivery to SOS facility.	1/31/11
30	3214292	License plate destroyed prior to delivery to SOS facility.	4/19/11
31	P361781	License plate issued in 2012 but recalled without distribution.	2/23/11
32	P361785	License plate issued in 2012 but recalled without distribution.	2/21/11

**Attachment E**  
**Shealey's 2011 Assist Reports Listing Plates Issued After Date of Assist**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
33	P341076	Issued to Facility on 2/24/12	3/6/11
34	P341098	Issued to Facility on 2/24/12	4/14/11
35	P341234	Issued to Facility on 2/28/12	2/28/11
36			4/11/11
37	P341235	Issued to Facility on 2/28/12	2/19/11
38	P341504	Issued to Facility on 2/28/12	1/31/11
39			4/14/11
40	P341545	Issued to Facility on 2/28/12	3/11/11
41			3/14/11
42	P341548	Issued to Facility on 2/28/12	4/11/11
43	P351039	Issued to Facility on 3/6/12	3/8/11
44	P351068	Issued to Facility on 3/6/12	3/14/11

**Attachment F**  
**Shealey's 2011 Assist Reports Listing License Plates That Have No Owner Record On File**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
45	2031450	No Owner Record On File	2/3/11
46	2031453	No Owner Record On File	2/13/11
47	2031488	No Owner Record On File	2/3/11
48	2141935	No Owner Record On File	2/14/11
49			2/27/11
50			3/11/11
51			3/23/11
52			4/10/11
53			4/23/11
54	2141936	No Owner Record On File	4/8/11
55	2141938	No Owner Record On File	3/13/11
56			3/18/11
57	2141972	No Owner Record On File	4/2/11
58	3012438	No Owner Record On File	3/19/11
59	3012456	No Owner Record On File	2/20/11
60	3013471	No Owner Record On File	3/26/11
61	3014252	No Owner Record On File	4/9/11
62	3014550	No Owner Record On File	2/23/11
63	3121076	No Owner Record On File	2/4/11
64	3121462	No Owner Record On File	4/10/11
65	3121472	No Owner Record On File	2/20/11
66	3121476	No Owner Record On File	4/28/11
67	3121745	No Owner Record On File	4/21/11
68	3121748	No Owner Record On File	3/5/11
69	3121935	No Owner Record On File	1/30/11
70			2/4/11
71			2/12/11
72			2/14/11
73			2/16/11
74			2/21/11
75			3/1/11
76			3/7/11
77			3/11/11
78			3/15/11
79			3/26/11
80			3/26/11
81			4/1/11
82			4/18/11
83	3121955	No Owner Record On File	3/15/11
84	3261078	No Owner Record On File	3/13/11
85	3511076	No Owner Record On File	1/30/11
86			2/19/11
87	3511077	No Owner Record On File	3/5/11
88			4/24/11

**Attachment F**

89	3511078	No Owner Record On File	4/4/11
90			4/23/11
91	3681748	No Owner Record On File	4/23/11
92	3681782	No Owner Record On File	4/18/11
93	3681787	No Owner Record On File	4/22/11
94	3681788	No Owner Record On File	2/2/11
95			2/20/11
96	3687145	No Owner Record On File	3/13/11
97	6512033	No Owner Record On File	4/9/11
98	6912031	No Owner Record On File	2/5/11
99			3/5/11
100	6912033	No Owner Record On File	4/24/11
101	6912035	No Owner Record On File	2/21/11
102	6912465	No Owner Record On File	3/26/11
103	6912475	No Owner Record On File	2/4/11
104	X612075	No Owner Record On File	4/15/11

**Attachment G**  
**Shealey's 2011 Assist Reports Listing Other Questionable License Plates**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Discrepancy</i></u>	<u><i>Date of Assist</i></u>
105		In series beginning with "30141"	2/27/11
106		In series beginning with "30145"	4/10/11
107		Inversion of "██████"	2/4/11
108		Assisted a vehicle with a beginning plate of "3121" 28 times	4/9/11
109		Assisted a vehicle with a beginning plate of "3121" 28 times	4/30/11
110		Assisted a vehicle with a beginning plate of "3121" 28 times	3/28/11
111		Assisted a vehicle with a beginning plate of "3121" 28 times	4/28/11
112		Plate is an inversion of "██████" that Shealey used 14 times	2/13/11
113		Inversion of "██████"	2/20/11
114		In series beginning with "32014"	3/14/11
115		In series beginning with "32610"	2/28/11
116		License Plate Listed Multiple Times	2/14/11
117			4/18/11
118		In series beginning with "35110"	2/5/11
119		In series beginning with "35110"	3/5/11
120		One digit change from "██████"	2/9/11
121		In series beginning with "35111"	2/3/11
122		In series beginning with "35111"	2/23/11
123		In series beginning with "36871"	2/9/11
124		In series beginning with "65110"	2/22/11
125		In series beginning with "65110"	4/25/11
126		License Plate Listed Multiple Times	4/18/11
127			4/21/11
128		License Plate Listed Multiple Times	3/13/11
129			3/15/11
130		License Plate Listed Multiple Times	3/11/11
131			3/12/11
132		In series beginning with "X9120"	2/7/11
133		In series beginning with "X9120"	2/28/11
134		Assisted a vehicle with a beginning plate of "A3415" six times	4/17/11
135		Assisted a vehicle with a beginning plate of "A3415" six times	4/23/11
136		Assisted a vehicle with a beginning plate of "A3415" six times	2/27/11
137		Assisted a vehicle with a beginning plate of "A3415" six times	4/25/11
138		Assisted a vehicle with a beginning plate of "A3415" six times	1/31/11
139		Assisted a vehicle with a beginning plate of "A3415" six times	3/8/11

**Attachment H**  
**Assist Reports for Surveillance of Mr. Shealey on June 11, 2013**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Time of Assist</u></b>	<b><u>Location of Assist</u></b>	<b><u>Surveillance Observation</u><sup>7</sup></b>
140	██████	6:00 a.m. – 6:15 a.m.	Dan Ryan/43 <sup>rd</sup>	Mr. Shealey was observed entering a McDonald's Restaurant at 69 <sup>th</sup> and Lafayette Ave. at 6:00 a.m. He departed McDonald's and entered the Dan Ryan Expressway at 6:06 a.m. Mr. Shealey exited the expressway at 6:12 a.m., stopped at newspaper stand on Pershing Road and State Street, then stopped at the curb on Wabash Avenue south of Pershing Road until 6:19 a.m. and then drove to the 4400 block of Federal.
141	██████	6:34 a.m. – 6:45 a.m.	Dan Ryan/41 <sup>st</sup>	Mr. Shealey was observed parked at a curb on 4400 block of Federal Street from 6:21 a.m. to 6:56 a.m., which was during the time of this recorded assist.
142	██████	7:20 a.m. – 7:35 a.m.	Dan Ryan/39 <sup>th</sup>	From 7:02 to 8:06 a.m., the OEIG lost visual surveillance of Mr. Shealey.
143	██████	8:10 a.m. – 8:22 a.m.	Kennedy/North	Mr. Shealey was observed driving on Wentworth Avenue at 59 <sup>th</sup> Street at 8:06 a.m. He entered the Dan Ryan Expressway at 8:19 a.m. from Garfield Avenue (5500 South)
144	██████	8:30 a.m. – 8:45 a.m.	Kennedy/18 <sup>th</sup>	Mr. Shealey was observed arriving at an accident at Dan Ryan/Taylor at 8:32 a.m. Mr. Shealey left the accident scene at 8:39 a.m. and announced over the ETP radio at 8:42 a.m. that he was back in service.
145	██████	9:00 a.m. – 9:13 a.m.	Kennedy/Lake	Mr. Shealey was observed parked at the Division Street Accident Investigation Site off the Kennedy Expressway northbound from 8:46 a.m. until 9:03 a.m. He was then observed driving on the expressway until he stopped at the Dan Ryan and 31 <sup>st</sup> at 9:14 a.m.
146	██████	10:15 a.m. – 10:30 a.m.	Kennedy/Division	Mr. Shealey was observed driving north on Princeton Avenue from Garfield Blvd. to Root Street. Mr. Shealey then parked along the curb on Wells Street north of Root Street between 10:07 a.m. and 10:22 a.m. He then entered the expressway at 10:23 a.m. until he exited at 10:36 a.m.
147	██████	11:40 a.m. – 12:00 p.m.	Kennedy/Monroe	Mr. Shealey was observed stopping to assist a vehicle on the shoulder of the Kennedy express lanes at Belmont Avenue at 11:39 a.m. He departed the scene at 11:47 a.m. He then assisted another vehicle, just south of this location at 11:48 a.m. and towed it away. He removed the vehicle from the tow boom at 12:15p.m.
148	██████	12:45 p.m. – 1:09 p.m.	Dan Ryan/47 <sup>th</sup>	Mr. Shealey was observed stopping at a Citgo gas station at Des Plaines and Taylor Street at 12:18 p.m. He then went into the gas station, returned to the truck and remained in the truck parked at the curb on Des Plaines Street until 1:09 p.m. Mr. Shealey then drove south on the Dan Ryan expressway, exited at 35 <sup>th</sup> Street, and drove directly to the ETP garage arriving at 1:15 p.m.

<sup>7</sup> The only OEIG observations detailed in this chart are those that occurred at or near the time of an assist reported by Mr. Shealey.

**Attachment I**  
**Assist Reports for Surveillance of Mr. Shealey on June 17, 2013**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Time of Assist</i></u>	<u><i>Location of Assist</i></u>	<u><i>Surveillance Observation<sup>8</sup></i></u>
149	██████	5:45 a.m. – 6:45 a.m.	Not Marked/123rd	OEIG heard Mr. Shealey received a communication from Command assigning him to assist with an accident at Interstate I-57 at 123 <sup>rd</sup> Street. Mr. Shealey was observed arriving at the scene at 5:56 a.m., and leaving at 6:38 a.m.
150	██████	6:55 a.m. – 7:15 a.m.	Not Marked/120th	Mr. Shealey was observed arriving at another accident just south of the first accident on I-57 at 6:38 a.m., and leaving at 6:43 a.m. Mr. Shealey was then observed stopping to assist with an accident at 119 <sup>th</sup> Street and I-57 at 6:59 a.m. He followed the vehicles until they were off the expressway at 7:08 a.m.
151	██████	7:20 a.m. – 7:30 a.m.	Not Marked/81st	Mr. Shealey was observed assisting two vehicles at 7:21 a.m. at the 87 <sup>th</sup> Street Accident Investigation Site on the Dan Ryan Expressway. A second ETP truck pulled along the side of Mr. Shealey's truck and the two drivers stood talking in front of their trucks until Mr. Shealey left at 8:03 a.m.
152	██████	8:16 a.m. – 8:30 a.m.	Ryan/76th	Mr. Shealey was observed stopping at the McDonald's Restaurant at 87 <sup>th</sup> Street and Wabash at 8:04 a.m. Mr. Shealey entered the restaurant, then got back into his truck at 8:15 a.m. and left. Mr. Shealey was then observed driving until he stopped to assist a vehicle at 8:29 a.m. on northbound I-57 near 111 <sup>th</sup> Street and towed the vehicle to 99 <sup>th</sup> Street and Emerald Ave. from 8:35 a.m. to 8:42 a.m.
153	██████	8:50 a.m. – 9:03 a.m.	Ryan/Not Marked	Mr. Shealey was observed stopping behind a vehicle with Illinois license plate ██████ at I-57 at 107 <sup>th</sup> Street at 8:47 a.m., and leaving the vehicle at 8:53 a.m.
154	██████	9:30 a.m. – 9:45 a.m.	I57/125th	Mr. Shealey was observed stopping to assist a vehicle at I-57 and Halsted Street from 9:17 a.m. to 9:28 a.m. Mr. Shealey was then observed exiting the expressway at 9:33 a.m. and stopping at a curb in the 7700 block of State Street. He was seen reentering the expressway at 10:07 a.m.

<sup>8</sup> The only OEIG observations detailed in this chart are those that occurred at or near the time of an assist reported by Mr. Shealey.

### Attachment I

155	N/A	10:15 a.m. – 10:25 a.m.	N/A	Mr. Shealey was observed driving on the expressway from 10:07 a.m. until 10:20 a.m. when he exited the expressway and parked in the 12000 block of Paulina. Mr. Shealey was observed out of the truck talking on a cell phone.
156	██████	11:15 a.m. – 11:25 a.m.	Not Marked	At 10:50 a.m., Mr. Shealey returned to the expressway to a dispatched assist of a motorist at I-57 and 147 <sup>th</sup> Street. Mr. Shealey was observed assisting this motorist and towing the vehicle (██████) from that location to a Marathon gas station at 159 <sup>th</sup> Street and Central Park Avenue. Mr. Shealey left the gas station at 11:08 a.m. and returned to the expressway. At 11:14 a.m., Mr. Shealey was observed parked under a tree near 128 <sup>th</sup> Street and Ashland Avenue. Mr. Shealey left his truck and entered a Wendy's Restaurant at that location. Mr. Shealey was observed outside the truck at that location until he left and reentered the expressway at 12:30 p.m.
157	Not Marked	12:45 p.m. – 1:00 p.m.	Ryan/95th	Mr. Shealey was observed assisting a vehicle at 12:39 p.m. on the Dan Ryan Expressway and 76 <sup>th</sup> Street. He followed the vehicle and exited the expressway at 71 <sup>st</sup> Street at 12:45 p.m. Mr. Shealey was observed exiting the Dan Ryan Expressway at 35 <sup>th</sup> Street at 12:55 p.m. and driving directly to the ETP garage at 3501 Normal Avenue.
158	██████	1:14 p.m. – 1:34 p.m.	I-57/107th	Mr. Shealey was observed pulling into the ETP garage parking lot at 12:59 p.m.

**Attachment J**  
**Assist Reports for Surveillance of Mr. Shealey on June 18, 2013**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Time of Assist</i></u>	<u><i>Location of Assist</i></u>	<u><i>Surveillance Observation<sup>9</sup></i></u>
159	██████	6:10 a.m. – 6:20 a.m.	N/A/41 <sup>st</sup> Street	Mr. Shealey was observed driving south on the Dan Ryan Expressway after leaving the ETP parking lot at 35 <sup>th</sup> Street and Normal Avenue at 5:50 a.m. Mr. Shealey then exited at Garfield Blvd. and drove to the 5600 block of LaSalle Street, where he sat stationary in his truck from 5:59 a.m. until 6:59 a.m.
160	██████	6:50 a.m. – 7:10 a.m.	Dan Ryan/ N/A	Mr. Shealey was observed parked at a curb in the 5600 block of LaSalle Street until 6:59 a.m. Mr. Shealey then drove on surface streets until he pulled behind a vehicle on Martin Luther King (MLK) Drive at Pershing Road at 7:09 a.m. The vehicle departed before Mr. Shealey could provide any assistance. Mr. Shealey continued to a shopping center at 35 <sup>th</sup> Street and MLK Drive, parked his truck, and went into a Dunkin Donuts at this location. Mr. Shealey returned to his truck and remained there until he left the parking lot at 7:20 a.m.
161	██████	7:35 a.m. – 7:45 a.m.	Dan Ryan/ N/A	From the Dunkin Donuts parking lot, Mr. Shealey was observed driving south on the Dan Ryan Expressway and exiting at 43 <sup>rd</sup> Street. He then pulled to the curb and parked under a tree on 43 <sup>rd</sup> Place just west of Wells Street from 7:28 a.m. to 8:56 a.m.
162	██████	8:25 a.m. – 8:45 a.m.	Dan Ryan/35 <sup>th</sup>	See above.
163	██████	9:04 a.m. – 9:20 a.m.	Dan Ryan/18 <sup>th</sup>	Mr. Shealey was observed in a gas station store at Garfield Blvd. and Wells Street at 9:00 a.m. Mr. Shealey returned to the truck at 9:15 a.m., and at 9:20 a.m., notified Command that he was taking his break at the gas station. Mr. Shealey did not reenter the expressway until 9:28 a.m.
164	██████	10:22 a.m. – 10:35 a.m.	Dan Ryan/ N/A	Mr. Shealey was observed parked at the curb on Wells Street just north of Root Street at 9:51 a.m. At 10:48 a.m., Mr. Shealey returned to the Dan Ryan Expressway, then exited and parked in the Church's Chicken parking lot at 59th Street and Wentworth Avenue at 10:56 a.m.

<sup>9</sup> The only OEIG observations detailed in this chart are those that occurred at or near the time of an assist reported by Mr. Shealey.

165	██████	11:45 a.m. – 11:55 a.m.	Dan Ryan/57 <sup>th</sup>	Mr. Shealey was observed parked in the 5600 block of LaSalle Street, at 11:00 a.m. At 11:40 a.m., surveillance investigators heard a radio transmission from Mr. Shealey stating that he was “northbound at 57 <sup>th</sup> .” Mr. Shealey was observed leaving the LaSalle Street location at 12:18 p.m.
166	██████	12:35 p.m. – 1:00 p.m.	Dan Ryan/39 <sup>th</sup>	Mr. Shealey was observed activating his emergency lights and pulled behind a vehicle (██████) on the Dan Ryan Expressway at Roosevelt Road at 12:33 p.m. Mr. Shealey finished the assist at 12:47 p.m.
167	██████	12:45 p.m. - 1:00 p.m.	N/A/Roosevelt	Surveillance investigators heard Mr. Shealey being dispatched to assist with an accident on the Dan Ryan Expressway near 45 <sup>th</sup> Street at 12:48 p.m. The accident was cleared by other ETP units prior to Mr. Shealey arriving on scene. Mr. Shealey was observed exiting southbound Dan Ryan Expressway at 35 <sup>th</sup> Street at 12:54 p.m., driving directly to the ETP garage at 3501 Normal Avenue, and entering the ETP parking lot at 12:56 p.m.

**Attachment K**  
**Shealey's 2013 Assist Reports For Which Owner Denied Receiving Assistance**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Owner Interview</u></b>	<b><u>Date of Assist</u></b>
168		Owner denied contact	8/10/13
169		Owner denied contact	6/26/13
170		Owner denied contact	5/29/13
171		Owner denied contact	5/21/13
172		Owner denied contact	8/1/13
173		Owner denied contact	5/4/13
174		Owner denied contact	5/7/13
175		Owner denied contact	8/17/13

**Attachment L**  
**Shealey's 2013 Assist Reports Listing License Plates That Have No Owner Record On File**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
176	3516016	No Owner Record On File	8/14/13
177	3516078	No Owner Record On File	6/21/13
179 <sup>10</sup>	4433029	No Owner Record On File	7/7/13
180	6031433	No Owner Record On File	5/18/13
181	6031439	No Owner Record On File	7/20/13
182	6033153	No Owner Record On File	5/7/13
183	6041284	No Owner Record On File	7/21/13
184	6041317	No Owner Record On File	5/27/13
185	6041744	No Owner Record On File	7/5/13
186	6041778	No Owner Record On File	6/17/13
187	6431076	No Owner Record On File	8/1/13
188	6431078	No Owner Record On File	7/18/13
189	6491076	No Owner Record On File	5/12/13
190	6492030	No Owner Record On File	5/18/13
191	6492436	No Owner Record On File	8/22/13
192	6912031	No Owner Record On File	8/25/13
193	7674703	No Owner Record On File	6/28/13
194	9087454	No Owner Record On File	7/27/13
195	9341054	No Owner Record On File	7/11/13
196	A355001	No Owner Record On File	7/21/13
197	B699017	No Owner Record On File	8/2/13
198	B699026	No Owner Record On File	6/25/13
199	B699030	No Owner Record On File	7/6/13
200	D122031	No Owner Record On File	5/22/13
201	D122065	No Owner Record On File	7/21/13
202	X644064	No Owner Record On File	6/25/13

<sup>10</sup> Due to an error, there is no Assist Report 178 for Mr. Shealey. The total number of Assist Reports listed on the last page of Mr. Shealey's Attachments correctly reflects the absence of this Assist Report.

**Attachment M**  
**Shealey's 2013 Assist Reports Listing Invalid License Plates**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
203	6041363	Invalid License Plate-Expired March 2009	5/20/13
204	6492031	Invalid License Plate-Expired June 2006, [REDACTED]	7/05/13
205		[REDACTED]	8/01/13
206	6492479	Invalid License Plate-Expired June 2009	5/27/13
207	7674712	Invalid License Plate-Expired February 2009	7/28/13
208	8433034	Invalid License Plate-Expired September 2009	8/4/13
209	8433095	Invalid License Plate-Expired September 2012	7/8/13
210	9341076	Invalid License Plate-Expired August 2012	5/19/13
211	H622612	Invalid License Plate-Expired July 2010	8/15/13
212	X644050	Invalid License Plate-Expired September 2012	5/12/13

**211<sup>11</sup> Total Assist Reports**

<sup>11</sup> Due to the fact that there is no Assist Report 178, as indicated in *Attachment L*, there are only 211 total Assist Reports listed within Mr. Shealey's attachments.

**Attachment N**  
**McKeon's 2011 Assist Reports For Which Owners Denied Receiving Assistance**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Owner Interview</u></b>	<b><u>Date of Assist</u></b>
1 2 3 4	██████	Owner stated no contact	3/11/11 3/25/11 4/7/11 4/21/11
5 6 7	██████	Owner stated no contact	3/11/11 4/1/11 4/21/11
8 9 10 11	██████	Owner stated no contact	4/7/11 4/21/11 4/25/11 4/28/11
12 13 14	██████	Owner stated no contact	4/24/11 4/24/11 4/24/11 <sup>12</sup>

<sup>12</sup> Mr. McKeon reported assisting a vehicle bearing this license plate three separate times on 4/24/11.

**Attachment O**  
**McKeon's 2011 Assist Reports For Plates Not Issued Or No Record Owner On File**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>
15 16	2575166	No Owner Record On File	3/20/11 3/20/11 <sup>13</sup>
17 18 19 20 21	6590626	No Owner Record On File	3/11/11 3/25/11 4/7/11 4/21/11 4/28/11
22 23	187M819	No Owner Record On File	4/17/11 4/17/11 <sup>14</sup>
24	BUH1618	License plate was never made	4/4/11
25	BVH1618	License plate was never made	3/11/11
26	BWH1618	License plate was never made	4/1/11

<sup>13</sup> Mr. McKeon reported assisting a vehicle bearing this license plate two different times on 3/20/11.

<sup>14</sup> Mr. McKeon reported assisting a vehicle bearing this license plate two different times on 4/17/11.

**Attachment P**  
**McKeon's 2011 Assist Reports Listing Other Questionable License Plates**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Discrepancy</i></u>	<u><i>Date of Assist</i></u>
28	[REDACTED] <sup>15</sup>	License Plate Listed Multiple Times	3/25/11
29			4/28/11
30	[REDACTED]	License Plate Listed Multiple Times	4/10/11
31			4/10/11 <sup>16</sup>
32	[REDACTED]	License Plate Listed Multiple Times	3/21/11
33			3/21/11 <sup>17</sup>
34	[REDACTED]	License Plate Listed Multiple Times	4/25/11
35			4/28/11
36	[REDACTED]	License Plate Listed Multiple Times	3/11/11
37			3/25/11
38			4/1/11
39			4/4/11
40			4/7/11
41			4/28/11
42	[REDACTED]	License Plate Listed Multiple Times	4/4/11
43			4/25/11
44	[REDACTED]	License Plate Listed Multiple Times	3/25/11
45			4/21/11
46	[REDACTED]	License Plate Listed Multiple Times	4/25/11
47			4/28/11

<sup>15</sup> The registered owner of the vehicle bearing this license plate was interviewed. The registered owner stated that she received no IDOT assistance; however, she was not the exclusive user and could not confirm that the other user had not received assistance.

<sup>16</sup> Mr. McKeon reported assisting this vehicle twice on the same date.

<sup>17</sup> Mr. McKeon reported assisting this vehicle twice on the same date.

**Attachment Q**  
**Assist Reports for Surveillance of Mr. McKeon on June 20, 2013**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Time of Assist</u></b>	<b><u>Location of Assist</u></b>	<b><u>Surveillance Observation<sup>18</sup></u></b>
48	██████	5:33 a.m. – 5:44 a.m.	Dan Ryan/Canal	Mr. McKeon was observed leaving the ETP lot at 5:41 a.m., and driving directly to a restaurant at Canalport and 18 <sup>th</sup> Streets. Mr. McKeon was seen entering the restaurant at 5:45 a.m., and leaving at 5:51 a.m.
49	██████	6:00 a.m. – 6:11 a.m.	Kennedy/Division	After leaving the restaurant, Mr. McKeon was observed driving directly to the Kimball Accident Investigation Site on the Kennedy Expressway, where he remained stationary from 5:59 a.m. until 6:19 a.m.
50	██████	6:33 a.m. – 6:44 a.m.	Kennedy/Kimball	Mr. McKeon was observed entering the parking lot of the Edens Office Plaza at Peterson Avenue and Cicero Avenue at 6:26 a.m. He then drove to the back of the parking lot, and parked under trees next to a forest preserve entrance where he remained stationary until 6:47 a.m.
51	██████	7:00 a.m. – 7:11 a.m.	Kennedy/Pulaski	After leaving the Edens Office Plaza, Mr. McKeon was observed driving on the Edens Expressway. He stopped under the overpass of Interstate 294, and remained stationary there until 7:43 a.m.
52	██████	7:33 a.m. - 7:44 a.m.	Edens/Wilson	From his previous location, Mr. McKeon was observed driving to the Cook County Forest Preserve Skokie Lagoons Boat Launch, where he parked and exited his truck at 7:47 a.m.
53	██████	8:00 a.m. – 8:11 a.m.	Edens/Touhy	Mr. McKeon remained at the Skokie Lagoons Tower Boat Launch from 7:47 a.m. until 8:04 a.m. when he left and reentered the Edens Expressway.
54	██████	8:33 a.m. – 8:44 a.m.	Edens/Not Marked	From 8:30 a.m. to 8:49 a.m., the OEIG lost visual surveillance of Mr. McKeon.
55	██████	9:00 a.m. – 9:11 a.m.	Edens/Dempster	Mr. McKeon was observed parked at the Cook County Forest Preserve Skokie Lagoons Tower Boat Launch at 8:49 a.m. He remained there until 9:10 a.m.

<sup>18</sup> The only OEIG observations detailed in this chart are those that occurred at or near the time of an assist reported by Mr. McKeon.

### Attachment Q

56	██████	9:33 a.m. – 9:44 a.m.	Edens/Belmont	From 9:31 a.m. to 9:37 a.m., the OEIG lost visual surveillance of Mr. McKeon. At 9:37 a.m., Mr. McKeon was observed parked again at the Edens Office Plaza near a forest preserve entrance. He remained there until 9:57 a.m., and then was observed driving on the outside shoulder of the Kennedy Expressway near Kimball Avenue with his emergency lights activated at 10:00 a.m.
57	██████	10:00 a.m. – 10:11 a.m.	Kennedy/California	Between 10:03 a.m. and 10:05 a.m., Mr. McKeon was observed stopping next to a vehicle (P556360) located at the Kennedy/California exit ramp. Mr. McKeon then continued on the Kennedy Expressway until he exited at Division Street at 10:17 a.m.
58	██████	10:33 a.m. – 10:38 a.m.	Kennedy/Addison	Mr. McKeon was observed assisting a vehicle with Wisconsin license plates at Kennedy/Belmont from 10:23 a.m. to 10:39 a.m.
59	██████	11:00 a.m. – 11:11 a.m.	Edens/Foster	Mr. McKeon was observed parked in a K-Mart parking lot off I-94 & Addison between 10:40 a.m. and 11:10 a.m.
60	██████	11:33 a.m. – 11:44 a.m.	Edens/Dempster	Mr. McKeon was observed parked at the forest preserve entrance at the Edens Office Plaza from 11:18 a.m. to 11:41 a.m.
61	██████	12:00 p.m. – 12:11 p.m.	Edens/Petersen	Mr. McKeon was observed parked in the McDonalds parking lot at Cullom Street and Cicero Avenue from 11:45 a.m. to 11:57 a.m. From 12:09 p.m. to 12:10 p.m., he was observed checking on a vehicle (G964093) at the Edens Expressway at Old Orchard Road, then continuing driving. At 12:19 p.m., Mr. McKeon stopped on the Edens Expressway at Peterson Avenue and checked on another IDOT vehicle.

**Attachment R**  
**Assist Reports for Surveillance of Mr. McKeon on June 24, 2013 (after 11:35 am)**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Time of Assist</i></u>	<u><i>Location of Assist</i></u>	<u><i>Surveillance Observation<sup>19</sup></i></u>
62	██████	11:33 a.m. – 11:44 a.m.	Kennedy/Irving Park	Surveillance of Mr. McKeon began at 11:35 a.m., when he was observed parked at Orleans Street near the Ohio Street feeder ramp.
63	██████	12:10 p.m. – 12:22 p.m.	Kennedy/California	Mr. McKeon was observed parked under trees near the forest preserve entrance at the Edens Office Plaza at Peterson Avenue and Cicero Avenue from 12:07 p.m. to 12:14 p.m. At 12:11 p.m., surveillance investigators heard Command attempt to contact Mr. McKeon on the ETP radio frequency with an assignment, but Mr. McKeon did not respond to the call. Mr. McKeon left this location at 12:14 p.m. and drove to the Ohio Street Accident Investigation site, arriving at 12:37 p.m.

**63 Total Assist Reports**

<sup>19</sup> The only OEIG observations detailed in this chart are those that occurred at or near the time of an assist reported by Mr. McKeon.

**Attachment S**  
**Casper's 2011 Assist Reports For Which Owner Denied Receiving Assistance**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Owner Interview</i></u>	<u><i>Date of Assist</i></u>
1	[REDACTED]	Owner stated no contact	3/8/11
2			3/21/11
3			3/29/11
4			4/6/11
5	[REDACTED]	Owner stated no contact	3/11/11
6			3/17/11
7			3/28/11
8	[REDACTED]	Owner stated no contact	3/15/11
9			3/30/11
10			4/11/11
11			4/19/11
12	[REDACTED]	Owner stated no contact	2/9/11
13			2/14/11
14			2/16/11
15			3/23/11
16	[REDACTED]	Owner had IDOT contact in the past, but not on dates reported	3/8/11
17			3/27/11
18			3/29/11
19			4/26/11
20	[REDACTED]	Owner stated no contact	4/4/11
21			4/10/11
22	[REDACTED]	Owner stated no contact	2/1/11
23			2/9/11
24			2/16/11
25			2/28/11
26			3/1/11

**Attachment T**  
**Casper's 2011 Assist Reports Listing License Plates That Have No Owner Record On File**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Secretary of State Confirmation</i></u>	<u><i>Date of Assist</i></u>
27	687694	No Owner Record On File	3/14/11
28			3/28/11
29			4/4/11
30			4/18/11
31	1155177	No Owner Record On File	4/10/11
32	1155197	No Owner Record On File	3/8/11
33			3/21/11
34			4/6/11
35			4/26/11
36	1155917	No Owner Record On File	3/27/11
37A	1945184	No Owner Record On File	3/17/11
37			3/27/11
38	6218547	No Owner Record On File	3/11/11
39			3/17/11
40	6294588	No Owner Record On File	3/11/11
41			3/15/11
42			3/30/11
43			4/19/11
44	8761318	No Owner Record On File	3/8/11
45			3/21/11
46			3/27/11
47			3/29/11
48			4/6/11
49			4/26/11
50	9881910	No Owner Record On File	3/23/11
51	9881942	No Owner Record On File	3/1/11
52	23826	No Owner Record On File	3/8/11 <sup>20</sup>
53			3/27/11
54			3/29/11
55			4/6/11
56			4/26/11
57	23826R	No Owner Record On File	3/15/11 <sup>21</sup>
58			3/30/11
59			4/11/11
60			4/19/11
61	273JSV	No Owner Record On File	3/14/11
62			3/28/11 <sup>22</sup>
63			4/4/11
64			4/10/11
65			4/18/11
66			4/27/11

<sup>20</sup> Each of the five Assist Sheets listed here for this license plate indicates that Mr. Casper provided assistance for this vehicle's tires.

<sup>21</sup> Each of the four Assist Sheets listed here for this license plate indicates that Mr. Casper provided assistance for this vehicle's tires.

<sup>22</sup> This and the next four Assist Sheets for this license plate in April 2011 claim that the assistance provided involved this vehicle's tires.

**Attachment T**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Secretary of State Confirmation</i></u>	<u><i>Date of Assist</i></u>
67	51197V	No Owner Record On File	3/26/11
68			4/4/11
69			4/10/11
70			4/18/11
71	54359V	No Owner Record On File	3/28/11
72			4/4/11
73			4/10/11
74			4/18/11
75	AB1590	No Owner Record On File	3/14/11
76			3/28/11
77			4/4/11
78			4/10/11
79			4/18/11
80			4/27/11
81	AWO9795	No Owner Record On File	3/14/11
82			3/28/11
83			4/4/11
84			4/10/11
85			4/18/11
86			4/27/11
87	P68167	No Owner Record On File	3/21/11
88			3/27/11
89			3/28/11
90			4/6/11
91			4/26/11
92	SZLA920	No Owner Record On File	3/30/11
93			4/19/11
94	X536649	No Owner Record On File	3/11/11
95	X536699	No Owner Record On File	3/17/11
96	X879955	No Owner Record On File	3/28/11
97			4/6/11

**Attachment U**  
**Casper's 2011 Assist Reports Listing Questionable License Plates**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Discrepancy</u></b>	<b><u>Date of Assist</u></b>
98	[REDACTED]	License Plate Listed Multiple Times	3/8/11
99			3/27/11
100			3/29/11
101			4/6/11
102			4/26/11
103	[REDACTED]	License Plate Listed Multiple Times	3/15/11
104			3/30/11
105			4/11/11
106			4/19/11
107	[REDACTED]	License Plate Listed Multiple Times	3/11/11
108			3/17/11
109			3/30/11
110	[REDACTED]	License Plate Listed Multiple Times	3/08/11
111			3/29/11
112			4/26/11
113	[REDACTED]	License Plate Listed Multiple Times	3/11/11
114			3/17/11
115	[REDACTED]	License Plate Listed Multiple Times	3/14/11
116			3/28/11
117			4/4/11
118			4/10/11
119			4/18/11
120			4/27/11
121	[REDACTED]	License Plate Listed Multiple Times	3/15/11
122			3/30/11
123			4/11/11
124			4/19/11
125	[REDACTED]	License Plate Listed Multiple Times	3/14/11
126			3/28/11
127			4/4/11
128			4/10/11
129			4/18/11
130	[REDACTED]	License Plate Listed Multiple Times	3/8/11
131			3/21/11
132			3/27/11
133			3/29/11
134			4/6/11
135			4/6/11
136	[REDACTED]	License Plate Listed Multiple Times	3/11/11
137			3/17/11
138	[REDACTED]	License Plate Listed Multiple Times	3/11/11
139			3/17/11
140	[REDACTED]	License Plate Listed Multiple Times	3/11/11
141			3/30/11
142			4/19/11

**Attachment U**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Discrepancy</i></u>	<u><i>Date of Assist</i></u>
143			3/28/11
144		License Plate Listed Multiple Times	4/4/11
145			4/18/11
146			3/25/11
147		License Plate Listed Multiple Times	3/30/11
148			4/19/11
149		License Plate Used Again in 2013	4/18/11

**Attachment V**  
**Casper's 2013 Assist Reports For Which Owner Denied Receiving Assistance**

<u>Assist Report #</u>	<u>License Plate</u>	<u>Owner Interview</u>	<u>Date of Assist in 2013</u>	<u># of Prior Assists to Same Plate in 2011</u>
150	[REDACTED]	Owner had IDOT contact in the past, but not on dates reported	5/8/13	4
151			5/9/13	
152			5/14/13	
153			5/15/13	
154			5/24/13	
155			5/30/13	
156			6/2/13	
157			6/4/13	
158			6/17/13	
159			6/19/13	
160			6/26/13	
161			7/8/13	
162			7/13/13	
163			8/4/13	
164			8/9/13	
165			8/13/13	
166			8/30/13	
167			9/1/13	
168			9/4/13	
169			9/15/13	
170			9/18/13	
171			9/19/13	
172	[REDACTED]	Owner stated no contact	7/15/13	n/a
173	[REDACTED]	Owner stated no contact	5/21/13	3
174			5/28/13	
175	[REDACTED]	Owner stated no contact	5/27/13	4
176			7/27/13	
177			8/10/13	
178	[REDACTED]	Owner stated no contact	7/27/13	4
179			8/10/13	
180	[REDACTED]	Owner stated no contact	7/6/13	2
181	[REDACTED]	Owner stated no contact	7/28/13	5
182			8/2/13	
183			8/11/13	
184	[REDACTED]	Owner stated no contact	6/29/13	n/a
185		Owner stated no contact	8/12/13	n/a

## Attachment W

**Casper's 2013 Assist Reports Listing License Plates That Have No Owner Record On File**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Secretary of State Confirmation</u></b>	<b><u>Date of Assist</u></b>	<b><u># of Prior Assists to Same Plate in 2011</u></b>
186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209	23826	No Owner Record On File	5/8/13 5/9/13 5/14/13 5/22/13 5/24/13 5/30/13 6/2/13 6/17/13 6/19/13 6/26/13 7/8/13 7/13/13 7/19/13 8/4/13 8/9/13 8/13/13 8/23/13 8/30/13 9/1/13 9/4/13 9/11/13 9/15/13 9/18/13 9/19/13	5
210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229	687694	No Owner Record On File	5/6/13 5/13/13 5/20/13 5/20/13 5/27/13 6/5/13 6/11/13 6/18/13 6/25/13 6/30/13 7/6/13 7/7/13 7/12/13 7/16/13 7/21/13 8/3/13 8/8/13 8/15/13 8/28/13 9/12/13	4

**Attachment W**

230 231	1900357	No Owner Record On File	7/27/13 8/10/13	n/a
232 233 234	6218547	No Owner Record On File	5/21/13 5/31/13 6/29/13	2
235 236 237 238	6294588	No Owner Record On File	5/17/13 7/27/13 8/10/13 8/31/13	4
239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259	8761318	No Owner Record On File	5/8/13 5/9/13 5/14/13 5/15/13 5/22/13 5/30/13 6/4/13 6/12/13 6/17/13 7/8/13 7/19/13 8/9/13 8/13/13 8/16/13 8/19/13 8/30/13 9/1/13 9/11/13 9/15/13 9/18/13 9/19/13	6

## Attachment W

260	273JSV	No Owner Record On File	5/6/13	6
261			5/10/13	
262			5/13/13	
263			5/20/13	
264			5/27/13	
265			5/28/13	
266			6/5/13	
267			6/11/13	
268			6/18/13	
269			6/23/13	
270			6/25/13	
271			6/30/13	
272			7/5/13	
273			7/6/13	
274			7/7/13	
275			7/12/13	
276			7/16/13	
277			7/17/13	
278			7/19/13	
279			7/21/13	
280			7/26/13	
281	51197V	No Owner Record On File	8/3/13	3
282			8/15/13	
283			8/16/13	
284			8/18/13	
285			8/28/13	
286	54359V	No Owner Record On File	8/29/13	4
287			9/6/13	
288			9/12/13	
289	AB1590	No Owner Record On File	7/16/13	6
290			7/21/13	
291			7/26/13	
292			8/15/13	
293			8/29/13	
294			7/16/13	
295			7/26/13	
296			8/15/13	
297			5/6/13	
298			6/18/13	
299			6/23/13	
300			6/25/13	
301			7/21/13	
302			8/8/13	
303			8/29/13	

**Attachment W**

304	1155197	No Owner Record on File	5/22/13	4 <sup>23</sup>
305			5/24/13	
306			5/30/13	
307			6/4/13	
308			7/2/13	
309			7/5/13	
310			7/13/13	
311			7/19/13	
312			8/9/13	
313			8/13/13	
314			8/23/13	
315			8/30/13	
316			9/1/13	
317			9/4/13	
318			9/15/13	

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<sup>23</sup> Two additional sheets list a license plate that is the same except two numbers are transposed.

**Attachment X**  
**Casper's 2013 Assist Reports Listing Other Questionable License Plates**

<u><i>Assist Report #</i></u>	<u><i>License Plate</i></u>	<u><i>Discrepancy</i></u>	<u><i>Date of Assist</i></u>	<u><i># of Prior Assists to Same Plate in 2011</i></u>
319	██████	Similar to other license plates that appear in 2013 data	8/19/13	n/a
320	██████	Similar to other license plates that appear in 2013 data	5/8/13	n/a
321	██████	License Plate Listed Multiple Times	5/8/13	5
322			5/9/13	
323			5/14/13	
324			5/15/13	
325			5/22/13	
326			5/24/13	
327			5/30/13	
328			6/4/13	
329			6/12/13	
330			6/17/13	
331			6/19/13	
332			6/26/13	
333			6/27/13	
334			7/8/13	
335			7/19/13	
336			8/4/13	
337			8/9/13	
338			8/13/13	
339			8/16/13	
340			8/19/13	
341			8/23/13	
342			8/30/13	
343			9/1/13	
344			9/4/13	
345			9/11/13	
346			9/15/13	
347			9/18/13	
348			9/19/13	
349	██████	Similar to other license plates that appear in 2013 data	8/8/13	n/a
350	██████	Similar to other license plates that appear in 2013 data	6/27/13	n/a
351	██████	Similar to other license plates that appear in 2013 data	7/1/13	n/a
352	██████	License Plate Listed Multiple Times	5/17/13	n/a
353			7/27/13	
354			8/10/13	
355	██████	Similar to other license plates that appear in 2013 data	8/31/13	n/a

**Attachment X**

356	██████	Similar to other license plates that appear in 2013 data	6/14/13	n/a
357	██████	Similar to other license plates that appear in 2013 data	8/19/13	n/a
358	██████	Similar to other license plates that appear in 2013 data	8/23/13	n/a
359	██████	Similar to other license plates that appear in 2013 data	5/22/13	n/a
360	██████	Similar to other license plates that appear in 2013 data	7/19/13	n/a
361	██████	Similar to other license plates that appear in 2013 data	8/19/13	n/a
362	██████	License plate also appears in 2011 data	6/25/13	1
363	██████	Similar to other license plate that appears in 2013 data	8/15/13	n/a
364	██████	Similar to other license plate that appears in 2013 data	8/02/13	n/a
365	██████	Similar to other license plate that appears in 2013 data	8/11/13	n/a
366	██████	Similar to another license plate that appears in 2013 data	8/30/13	n/a
367 368 369 370	██████	License Plate Listed Multiple Times	5/17/13 5/21/13 8/10/13 8/30/13	4
371	██████	Similar to other license plates that appear in 2013 data	7/26/13	n/a
372	██████	Similar to other license plates that appear in 2013 data	7/16/13	n/a
373 374 375 376 377 378 379 380 381 382	██████	License Plate Listed Multiple Times	5/6/13 5/10/13 5/13/13 6/23/13 7/21/13 7/26/13 8/8/13 8/22/13 8/29/13 9/12/13	3
383	██████	Similar to other license plates that appear in 2013 data	8/15/13	n/a
384	██████	Similar to other license plates that appear in 2013 data	8/11/13	n/a
385	██████	Similar to other license plates that appear in 2013 data	7/15/13	n/a

**Attachment X**

386	██████	Similar to another license plate that appears in 2013 data	5/31/13	n/a
387 388	██████	License Plate Listed Multiple Times	5/21/13 6/29/13	2
356	██████	Similar to other license plates that appear in 2013 data	6/14/13	n/a
357	██████	Similar to other license plates that appear in 2013 data	8/19/13	n/a
358	██████	Similar to other license plates that appear in 2013 data	8/23/13	n/a
359	██████	Similar to other license plates that appear in 2013 data	5/22/13	n/a
360	██████	Similar to other license plates that appear in 2013 data	7/19/13	n/a
361	██████	Similar to other license plates that appear in 2013 data	8/19/13	n/a
362	██████	License plate also appears in 2011 data	6/25/13	1
363	██████	Similar to other license plate that appears in 2013 data	8/15/13	n/a
364	██████	Similar to other license plate that appears in 2013 data	8/02/13	n/a
365	██████	Similar to other license plate that appears in 2013 data	8/11/13	n/a
366	██████	Similar to another license plate that appears in 2013 data	8/30/13	n/a
367 368 369 370	██████	License Plate Listed Multiple Times	5/17/13 5/21/13 8/10/13 8/30/13	4
371	██████	Similar to other license plates that appear in 2013 data	7/26/13	n/a
372	██████	Similar to other license plates that appear in 2013 data	7/16/13	n/a
373 374 375 376 377 378 379 380 381 382	██████	License Plate Listed Multiple Times	5/6/13 5/10/13 5/13/13 6/23/13 7/21/13 7/26/13 8/8/13 8/22/13 8/29/13 9/12/13	3
383	██████	Similar to other license plates that appear in 2013 data	8/15/13	n/a

**Attachment X**

384	██████	Similar to other license plates that appear in 2013 data	8/11/13	n/a
385	██████	Similar to other license plates that appear in 2013 data	7/15/13	n/a
386	██████	Similar to another license plate that appears in 2013 data	5/31/13	n/a
387 388	██████	License Plate Listed Multiple Times	5/21/13 6/29/13	2
389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416	██████	License Plate Listed Multiple Times	5/6/13 5/10/13 5/13/13 5/20/13 5/27/13 5/28/13 6/5/13 6/11/13 6/18/13 6/23/13 6/25/13 6/30/13 7/1/13 7/5/13 7/6/13 7/7/13 7/12/13 7/15/13 7/17/13 7/27/13 7/28/13 8/3/13 8/8/13 8/18/13 8/22/13 8/23/13 8/28/13 9/12/13	6
417	██████	Similar to other license plates that appear in 2013 data	7/21/13	n/a
418	██████	Similar to other license plates that appear in 2013 data	8/26/13	n/a

**Attachment X**

419			5/6/13	
420			5/13/13	
421			5/20/13	
422			5/27/13	
423			5/28/13	
424			6/11/13	
425			6/18/13	
426			6/23/13	
427			6/25/13	
428			7/5/13	
429	██████	License Plate Listed Multiple Times	7/6/13	5
430			7/7/13	
431			7/12/13	
432			7/17/13	
433			7/21/13	
434			7/26/13	
435			8/3/13	
436			8/8/13	
437			8/22/13	
438			8/28/13	
439			8/29/13	
440			5/9/13	
441			5/30/13	
442			6/4/13	
443			6/12/12	
444			6/17/13	
445			6/19/13	
446			7/19/13	
447	██████	License Plate Listed Multiple Times	7/19/13	6
448			8/4/13	
449			8/9/13	
450			8/13/13	
451			8/16/13	
452			8/23/13	
453			9/1/13	
454			9/4/13	
455			9/19/13	
456	██████	License Plate Listed Multiple Times	5/31/13	2
457			6/29/13	
458	██████	Similar to another license plate that appears in 2013 data	7/28/13	n/a

**Attachment X**

459			5/6/13	
460			5/10/13	
461			5/13/13	
462			5/27/13	
463			5/28/13	
464			6/5/13	
465			6/11/13	
466			6/23/13	
467			6/25/13	
468			6/27/13	
469			6/30/13	
470	████	License Plate Listed Multiple Times	7/5/13	n/a
471	████		7/6/13	
472			7/7/13	
473			7/16/13	
474			7/16/13 <sup>24</sup>	
475			7/17/13	
476			7/21/13	
477			8/8/13	
478			8/15/13	
479			8/16/13	
480			8/22/13	
481			8/28/13	
482			8/29/13	
483			9/12/13	
484	████████	Similar to other license plates that appear in 2013 data	8/3/13	n/a
485	████████	Similar to other license plates that appear in 2013 data	8/18/13	n/a
486	████████	Similar to other license plates that appear in 2013 data	7/1/13	n/a
487	████████	Similar to other license plates that appear in 2013 data	5/20/13	n/a
488		License Plate Listed Multiple Times	6/12/13	n/a
489	████		6/19/13	
490			7/13/13	
491			8/4/13	
492	████████	License plate also appears multiple times in 2011 data	8/31/13	2

<sup>24</sup> Mr. Casper reported assisting a vehicle bearing this license plate two times on 7/16/13.

**Attachment Y**  
**Casper 2013 Additional Questionable Assist Reports**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Discrepancy</u></b>	<b><u>Date of Assist</u></b>
493	None listed	No license plate or mile marker	5/7/13
494	None listed	No license plate or mile marker	
495	None listed	No license plate* <sup>25</sup>	
496	None listed	No license plate or mile marker	
497	None listed	No license plate or mile marker	
498	None listed	No license plate*	
499	None listed	No license plate or mile marker	
500	None listed	No license plate or mile marker	
501	None listed	No license plate or mile marker	
502	None listed	No license plate	8/1/13
503	None listed	No license plate	
504	None listed	No license plate	
505	None listed	No license plate*	
506	None listed	No license plate*	
507	None listed	No license plate*	

**508<sup>26</sup> Total Assist Reports**

<sup>25</sup> \* denotes that the cause of assist was listed as “debris,” which means a vehicle was not assisted and therefore, no license plate is expected.

<sup>26</sup> Due to the addition of Assist Report 37A in *Attachment T*, there are actually 508 total Assist Reports listed within Mr. Casper’s attachments.

**Attachment Z**  
**Matthews 2011 Assist Reports For Which Owner Denied Receiving Assistance**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Owner Interview</u></b>	<b><u>Date of Assist</u></b>
1	[REDACTED]	Owner stated no contact	2/17/11
2			2/17/11
3			2/19/11
4	[REDACTED]	Owner stated no contact <sup>27</sup>	3/29/11
5			4/18/11
6			4/26/11
7	[REDACTED]	Owner is a cab company – no record of accident reported	3/29/11
8			4/19/11
9	[REDACTED]	Owner stated no contact	3/29/11
10			3/30/11
11			4/18/11
12	[REDACTED]	Owner stated no contact	3/18/11
13			4/1/11
14			4/6/11
15	[REDACTED]	Owner stated no contact	2/22/11
16			3/2/11
17			3/16/11

<sup>27</sup> The owner of this vehicle was not the exclusive user; rather, his daughter was the primary user of the vehicle. The daughter denied being in any accidents or being assisted by IDOT on the dates in question. The owner could not be contacted, but his daughter did not believe he had any contact with IDOT on the dates in question.

**Attachment AA**  
**Matthews 2011 Assist Reports Listing Questionable License Plates**

<b>Assist Report #</b>	<b><u>License Plate</u></b>	<b><u>Date of Accident</u></b>	<b><u>Other Vehicles Involved in Accident</u></b>			
18	[REDACTED]	2/16/2011	[REDACTED]	[REDACTED]		
19		3/15/2011	[REDACTED]	[REDACTED]		
20	[REDACTED]	2/28/2011	[REDACTED]			
21		3/6/2011				
22	[REDACTED]	3/2/2011	[REDACTED]	[REDACTED]	[REDACTED]	
23		3/16/2011				
24	[REDACTED]	2/17/2011	[REDACTED]			
25		2/19/2011		[REDACTED]		
26	[REDACTED]	3/3/2011	[REDACTED]	[REDACTED]	[REDACTED]	
27		4/7/2011	[REDACTED]	[REDACTED]	[REDACTED]	
28A	[REDACTED]	2/25/11				
28		2/27/2011				
29		4/5/2011	[REDACTED]	[REDACTED]	[REDACTED]	
30	[REDACTED]	4/15/2011	[REDACTED]	[REDACTED]		
31		4/20/2011				
32		4/26/2011	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
33	[REDACTED]	2/22/2011	[REDACTED]	[REDACTED]	[REDACTED]	
34		3/16/2011	[REDACTED]	[REDACTED]		
35	[REDACTED]	2/21/2011	[REDACTED]	[REDACTED]		
36		3/9/2011	[REDACTED]	[REDACTED]		
37	[REDACTED]	2/3/2011	[REDACTED]	[REDACTED]		
38		2/3/2011	[REDACTED]	[REDACTED]		
39	[REDACTED]	2/23/2011	[REDACTED]	[REDACTED]	[REDACTED]	
40		3/10/2011		[REDACTED]		
41	[REDACTED]	2/3/2011	[REDACTED]	[REDACTED]	[REDACTED]	
42		2/5/2011		[REDACTED]	[REDACTED]	
43		3/6/2011		[REDACTED]	[REDACTED]	
44		3/11/2011		[REDACTED]		
45	[REDACTED]	2/16/2011	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
46		3/15/2011		[REDACTED]		
47	[REDACTED]	3/17/2011	[REDACTED]	[REDACTED]		
48		3/30/2011	[REDACTED]	[REDACTED]		
49		3/31/2011	[REDACTED]			
50	[REDACTED]	2/27/2011				
51		3/9/2011	[REDACTED]	[REDACTED]	[REDACTED]	
52		4/5/2011	[REDACTED]			
53	[REDACTED]	2/28/2011	[REDACTED]			
54		4/20/2011	[REDACTED]			
55	[REDACTED]	3/24/2011	[REDACTED]	[REDACTED]	[REDACTED]	
56		3/31/2011		[REDACTED]	[REDACTED]	

## Attachment AA

57		3/18/2011				
58		4/1/2011				
57		3/18/2011				
58		4/1/2011				
59		3/29/2011				
60		3/30/2011				
61		4/18/2011				
62		4/26/2011				
63		2/3/2011				
64		2/5/2011				
65		3/6/2011				
66		3/24/2011				
67		3/31/2011				
68		4/4/2011				
69		3/18/2011				
70		4/7/2011				
71		3/2/2011				
72		3/31/2011				
73		2/4/2011				
74		4/7/2011				
75		2/12/2011				
76		3/6/2011				
77		2/23/2011				
78		3/10/2011				
79		2/21/2011				
80		4/5/2011				
81		2/26/2011				
82		3/5/2011				
83		3/24/2011				
84		3/30/2011				
85		3/29/2011				
86		4/18/2011				
87		4/20/2011				
88		3/2/2011				
89		3/30/2011				
90		4/4/2011				
91		2/12/2011	Plate not filled in			
92		3/6/2011				
93		2/23/2011				
94		3/10/2011				
95		3/2/2011				
96		3/16/2011				
97		4/15/2011				
98		4/26/2011				
99		3/24/2011				
100		4/4/2011				

**Attachment AA**

101		2/22/2011				
102		3/16/2011				
103		4/15/2011				
104		4/19/2011				
105		4/26/2011				
106		3/18/2011				
107	<sup>28</sup>	4/1/2011				
108		4/6/2011				
109		3/24/2011				
110		3/30/2011				
111		3/2/2011				
112		3/16/2011				
113		4/20/2011				
114		4/29/2011				
115		2/5/2011				
116		3/11/2011				
117		3/2/2011				
118		4/4/2011				
119		2/3/2011				
120		3/6/2011				
121		2/25/2011				
122		3/3/2011				
123		3/18/2011				
124		4/1/2011				
125		4/6/2011				
126		2/16/2011				
127		3/15/2011	Plate not filled in			
128		2/22/2011				
129		3/2/2011				
130		2/27/2011				
131	<sup>29</sup>	2/21/2011				
132		2/21/11	Tire			
133		2/27/11	Tire			
134		4/19/11	Tire			
135		4/26/11				
136		2/19/11	Mechanical			
137		2/21/11				
138		2/17/11	none <sup>30</sup>			
139		2/19/11	Mechanical			
140		3/09/11				
141		4/05/11	Tire			

<sup>28</sup> This license plate was also listed on at least one of Mr. Matthews' Assist Reports in 2013.

<sup>29</sup> This license plate came back as having no record of owner on file.

<sup>30</sup> This Assist Report was marked as a multi-vehicle accident; however, investigators did not find any other Assist Report with details that matched this assist.

**Attachment AA**

142	[REDACTED]	2/28/11	[REDACTED]			
143		3/06/11	Out of Fuel			
144	[REDACTED]	3/02/11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
145		4/04/11	Tire			
146	[REDACTED]	3/24/11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
147		3/30/11	Cooling			
148	[REDACTED]	2/26/11	[REDACTED]	[REDACTED]		
149		3/05/11	Tire			
150	[REDACTED]	4/15/11	Tire			
151		4/19/11	Tire			
152	[REDACTED]	2/22/2011	Tire			
153		3/2/2011	[REDACTED]			
154		3/16/2011	[REDACTED]	Plate not filled in		
155	[REDACTED]	2/03/11	[REDACTED]	[REDACTED]		
156		2/05/11	[REDACTED]			
157	[REDACTED]	2/03/11	[REDACTED]	[REDACTED]		
158		2/05/11	[REDACTED]	[REDACTED]		
159	[REDACTED]	2/3/11				
160		2/5/11				

**Attachment BB**  
**Matthews' 2013 Assist Reports For Which Owner Denied Receiving Assistance**

<b><u>Assist Report #</u></b>	<b><u>License Plate</u></b>	<b><u>Owner Interview</u></b>	<b><u>Date of Assist</u></b>
161	[REDACTED]	Owner stated no contact	5/7/2013
162			7/13/2013
163			8/25/2013
164			8/25/2013 <sup>31</sup>
165	[REDACTED]	Owner stated no contact	5/16/2013
166			6/26/2013
167	[REDACTED]	Owner stated no contact on one date	8/29/2013
169	[REDACTED]	Owner stated no contact on one date <sup>32</sup>	7/13/2013
170			7/26/2013

<sup>31</sup> This license plate was reportedly in an accident at 8:05am on 8/25 and at 11:11am on 8/25. As noted above, the owner denied having any contact with IDOT on this date.

<sup>32</sup> The owner confirmed he was assisted by ETP for an accident on 7/13/12, but denied receiving assistance on 7/26/13.

**Attachment CC**  
**Matthews' 2013 Questionable Assist Reports**

<u>Assist Report #</u>	<u>License Plate</u>	<u>Reason for Assist</u>	<u>Date of Assist</u>
171	[REDACTED]	Accident w/ more than one vehicle	7/21/2013
172		Tire	7/22/2013
173	[REDACTED]	Accident w/ more than one vehicle	7/13/2013
174		Out of fuel	7/22/2013
175		Accident w/ more than one vehicle	7/26/2013
176	[REDACTED]	Accident w/ more than one vehicle	5/16/2013
177		Other/unknown	6/26/2013
178	[REDACTED]	Accident w/ more than one vehicle	7/21/2013
179		Accident w/ more than one vehicle	7/26/2013
180	[REDACTED] <sup>33</sup>	Accident w/ more than one vehicle	7/21/2013
181		Accident w/ more than one vehicle	7/22/2013
182	[REDACTED] <sup>34</sup>	Accident w/ more than one vehicle	7/13/2013
183		Tire	7/21/2013
184	[REDACTED]	Accident w/ more than one vehicle	8/13/2013
185		Accident w/ more than one vehicle	8/29/2013
186	[REDACTED]	Accident w/ more than one vehicle	5/7/2013
187		Tire	7/13/2013
188		Mechanical	7/22/2013
189		Accident w/ more than one vehicle	7/26/2013
190	[REDACTED]	Tire	7/22/2013
191		Accident w/ more than one vehicle	7/26/2013
192	[REDACTED]	Accident w/ more than one vehicle	7/21/2013
193		Accident w/ more than one vehicle	7/22/2013
194		Accident w/ more than one vehicle	7/26/2013
195	[REDACTED]	Accident w/ more than one vehicle	5/19/2013
196		Accident w/ more than one vehicle	6/26/2013
197	[REDACTED]	Tire	6/20/2013
198		Tire Accident w/ more than one vehicle	6/29/2013
199	[REDACTED]	Out of fuel	8/3/2013
200		Cooling System	7/28/2013
201	[REDACTED]	Tire	7/28/2013
202		Tire	7/7/2013
203	[REDACTED]	Accident w/ more than one vehicle	8/25/2013
204		Out of fuel	8/29/2013

**204 Total Assist Reports**

<sup>33</sup> This license plate is almost identical to another license plate submitted by Mr. Matthews during this time period. That license plate, 900383, was submitted by Mr. Matthews on July 26, 2013, but is not listed in this chart because that exact license plate only appeared once.

<sup>34</sup> This license plate had the same first 5/7 digits as another license plate submitted by Mr. Matthews during this time period. That license plate, K686222, was submitted by Mr. Matthews on July 19, 2013, but is not listed in this chart because that exact license plate only appeared once.



# Illinois Department of Transportation

Office of Finance and Administration / Bureau of Investigations and Compliance  
2300 South Dirksen Parkway / Springfield, Illinois 62764

CONFIDENTIAL

September 28, 2016

Ms. Margaret A. Hickey  
Acting Executive Inspector General  
Office of Executive Inspector General  
for the Agencies of the Illinois Governor  
69 West Washington Street, Suite 3400  
Chicago, Illinois 60602

**Re: OEIG Case No. 11-00964**

Dear Ms. Hickey:

This letter is in response to your January 19, 2016 letter regarding case number 11-00964 in which you requested that IDOT report to your office the actions that have been taken to address the recommendations made relative to your investigation into allegations that IDOT's ETP drivers were submitting falsified work documents in violation of IDOT policies.

As recommended in your report, IDOT has disciplined the employees involved in this matter. John Gonzalez, John Shealey, Kevin McKeon, Andrew Casper, Robert Matthews and Zen McHugh have been discharged. Joseph Huante and Robin Thorpe received 15 day suspensions. David Alcantar, Dimitris Coleman, Sean Huber, Jerome Lockhart, Francois Mendez and Michael Piwcewicz received 10 day suspensions.

Thank you for your assistance concerning this matter. If you have any questions, or if I can be of assistance to you or your staff, please do not hesitate to contact me at 217-558-4617.

Respectfully,

A handwritten signature in black ink, appearing to read 'Bruce Harmening', with a long horizontal line extending from the end.

Bruce Harmening  
Bureau Chief



# Illinois Department of Transportation

Office of Finance and Administration / Bureau of Investigations and Compliance  
2300 South Dirksen Parkway / Springfield, Illinois 62764

CONFIDENTIAL

August 11, 2016

Ms. Margaret A. Hickey  
Acting Executive Inspector General  
Office of Executive Inspector General  
for the Agencies of the Illinois Governor  
69 West Washington Street, Suite 3400  
Chicago, Illinois 60602

**Re: OEIG Case No. 11-00964**

Dear Ms. Hickey:

This letter is in response to your January 19, 2016 letter regarding case number 11-00964 in which you requested that we report to your office the actions that have been taken to address the recommendations made relative to your investigation into allegations that IDOT's ETP drivers were submitting falsified work documents in violation of IDOT policies.

As your report recommended, IDOT has initiated the discipline process for the employees included in the report. The Collective bargaining agreement specifies a process for discipline and as you probably know the process could take some time for resolution. The Department will provide you updates as the process moves along.

ETP management has also implemented controls to prevent and discourage fraudulent reporting by ETP drivers. All drivers have been re-trained in regards to daily operations, communications protocol and assist reporting. At this training it was reiterated that ETP staff is required to call into the Communications Center when they stop for an assist or leave their vehicle and must provide the location and license number of the vehicle for which assistance is being offered. After the assist is complete the driver must again notify the Communications Center that the task is complete and when they are back in service.

Additionally the assist sheet is to be completed on-site and the driver to whom the assistance was given will be asked to sign the form. The assist sheet will then be reviewed by the shift supervisor who will also sign them. The Communications Center dispatcher will record the incident information, time, location, ETP unit number, and plate information on their dispatcher log sheet and the radio communication will be archived with this same

Ms. Margaret A. Hickey  
Page 2 of 2  
August 11, 2016

information. Confirmation of the emergency vehicle location may also be done at this time if the truck has an operational AVL unit. Staff from the Bureau of Traffic have been selecting random assist sheets to check for completeness and comparing them for consistency to the Communications Center logs and AVL for the given truck.

Additional improvements are being considered and will be described in a subsequent letter to your office which will also contain the outcome of the employee discipline process. Thank you for your assistance concerning this matter. If you have any questions, or if I can be of assistance to you or your staff, please do not hesitate to contact me at 217-558--

Respectfully,

A handwritten signature in black ink, appearing to read "Bruce Harmening", with a long diagonal stroke extending downwards and to the right.

Bruce Harmening  
Bureau Chief

RECEIVED  
NOV 21 2016

IN THE EXECUTIVE ETHICS COMMISSION  
OF THE STATE OF ILLINOIS

EXECUTIVE ETHICS COMMISSION

IN RE: John Shealey

)

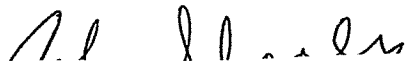
#11-00964

RESPONDENT'S SUGGESTIONS FOR REDACTION / PUBLIC RESPONSE

Please check the appropriate line and sign and date below. If no line is checked the Commission will not make your response public if the redacted report is made public.

☒ Below is my public response. Please make this response public if the summary report is also made public; or

☐ Below are my suggestions for redaction. I do not wish for these suggestions to be made public.



Respondent's Signature

11-20-16

Date

Instructions: Please write or type suggestions for redaction or a public response on the lines below. If you prefer, you may attach separate documents to this form. Return this form and any attachments to:

Illinois Executive Ethics Commission  
401 S. Spring Street, Room 513 Wm. Stratton Building  
Springfield, IL 62706

"John Shealey" I WAS NOT  
Treated Right IN THIS INVESTIGATION.  
ALL Drivers Should Be Treated  
"equally" ALL THREE Shifts should be  
Treated "The Same"